

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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21-CR-265 (PKC)

UNITED STATES OF AMERICA,

United States Courthouse
Brooklyn, New York

-against- June 14, 2023
9:00 a.m.

MICHAEL MCMAHON ET AL.,

Defendants.

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TRANSCRIPT OF CRIMINAL CAUSE FOR TRIAL
BEFORE THE HONORABLE PAMELA K. CHEN
UNITED STATES DISTRICT JUDGE
BEFORE A JURY

APPEARANCES

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Proceedings recorded by mechanical stenography. Transcript
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1 (In open court.)

2 THE COURT: Okay. Good morning. Have a seat. All
3 right. We are all here now, I see. Let's go ahead and get
4 our jury.

5 Just two things before we get the jury.

6 One is I want to make sure everyone has reviewed the
7 exhibits they think have been admitted and confirmed each
8 other's lists because once the summations are done and the
9 instructions are done, we're going to send the exhibits back
10 with the jury. So you'll need to confirm everything with
11 Ms. Gonzalez to make sure we are sending back just those
12 exhibits that everyone agrees have been admitted.

13 And then, secondly, I want to turn to the defense
14 and find out the order that you intend to go in and whether or
15 not you've agreed on it. I'm assuming you have, but I just
16 want to make sure there isn't any dispute about that.

17 MR. LUSTERBERG: I think the agreement is tacit at
18 best.

19 THE COURT: Okay. A presumption I guess that you're
20 going to go first.

21 MR. LUSTERBERG: Yeah. We're just going to go in
22 the same order that's in the indictment order. And -- but I
23 will be honest and tell you, I have not spoken to either
24 Mr. Goldberger or Mr. Tung about that. So if they change
25 their mind right now, I'm wide open.

1 THE COURT: Okay. So if we follow the same order
2 we've been using thus far for all the examinations, I mean,
3 unless you folks pop up because I know some witnesses are more
4 important to some defendants than others, I'm assuming it'll
5 be Mr. Lusterberg, then Mr. Goldberger, and then Mr. Tung,
6 correct?

7 MR. TUNG: Correct.

8 THE COURT: Okay. And then the Government will
9 rebut and I assume, Mr. Heeren, you're doing rebuttal?

10 MR. HEEREN: Yes, Your Honor.

11 THE COURT: And Ms. Arfa, you're doing the
12 summation?

13 MS. ARFA: Yes, Your Honor.

14 THE COURT: All right. So I think we're set.

15 MR. LUSTERBERG: Judge, I have one question about
16 exhibits which is -- how does the videos work? I mean --
17 because I know often what was admitted actually was just,
18 like, a little thumb drive or whatever.

19 If the jury wants to review that, what's the
20 process?

21 THE COURT: We provide a laptop to them that's
22 clean. And it comes from our IT department, unless the
23 Government has made a different arrangement with Ms. Gonzalez.
24 And then the Government, who presumably possesses all of those
25 video exhibits, will put them on a flash drive and will give

1 that to the jury with instructions.

2 Last trial we had, there was all sorts of password
3 protections or something that caused problems and -- so the
4 jury kept coming out with notes about, can someone unlock the
5 exhibits for us. So hopefully, we'll take care of that
6 problem this time.

7 MR. HEEREN: I do think it's still going to be a
8 problem, because we have no ability to not password protect
9 our stuff, as much as we'd like to. And in terms of the
10 computer, I believe what you just described is what
11 Ms. Gonzalez is doing.

12 THE COURT: Yes, she's all over this. So I have no
13 doubt that she's made the appropriate arrangements for that.
14 And then just make sure that you folks write down the
15 password.

16 THE COURTROOM DEPUTY: All rise.

17 (Jury enters the courtroom.)

18 THE COURT: Please be seated, everyone.

19 I think Ms. Gonzalez has to teach you the two-handed
20 knocking technique where you hold the door and then you knock.
21 I don't know who's doing it back there, but I think that's the
22 key to success with knocking on the door.

23 THE COURTROOM DEPUTY: Don't worry. You get another
24 shot.

25 THE COURT: So ladies and gentlemen of the jury, I

1 hope you had a good and restful evening. As I mentioned
2 yesterday, we are going to hear from the parties with respect
3 to their summations which are, as I told you at the start of
4 the trial, their argument and their interpretation of the
5 evidence that they're going to urge to you. So we'll start
6 off with the Government summation, then each of the defendants
7 will have a chance to make their summations, and then the
8 Government will go last with rebuttal, because, as you know,
9 it's their burden of proof, so they always go last.

10 So I gather that Ms. Arfa will give the opening
11 summation for the Government.

12 Ms. Arfa.

13 And let me just say this, ladies and gentlemen: I
14 remind you that all, the exhibits that have been admitted have
15 been sent back to you. So you can review them to the extent
16 any party references them during their closing statements and
17 then if at any point you need any portion of the transcript
18 sent back to you, a witness' testimony or something like that,
19 you can also request that during your deliberations. All
20 right.

21 Go ahead, Ms. Arfa.

22 MS. ARFA: Good morning.

23 THE JURY: Good morning.

24 MS. ARFA: For almost three years, Xu Jin and his
25 wife, Liu Fang were terrorized by the Chinese Government.

1 That happened here in the United States where they live. The
2 Chinese Government wanted Xu Jin and Liu Fang to return to
3 China so the Chinese Government, using a number of different
4 people, including each of the defendants, and every person on
5 this board, harassed and stalked and threatened Xu Jin and
6 Liu Fang and their families.

7 Strangers went to the home of Liu Fang's
8 sister-in-law in New Jersey. They did it in order to deliver
9 messages to Xu Jin. One of those messages is, If you want to
10 protect your family, the only options are to return to China
11 or kill yourself.

12 Xu Jin's sick, elderly father was sent halfway
13 across the world from China to New Jersey to try to force
14 Xu Jin to return to China. Xu Jin's father made that long,
15 dangerous trip because of threats to the safety of his own
16 wife and daughter back in China.

17 Strangers went to the home of Xu Jin and Liu Fang,
18 pounded on their door, tried to open that door, and then left
19 a threatening note. The note said that if Xu Jin returned to
20 China and if he spent 10 years in prison there, then his wife
21 and his child would be safe.

22 A stranger sent harassing Facebook messages to the
23 friends of Xu Jin and Liu Fang's daughter and then there was a
24 flood of mail sent from China to Liu Fang's sister, mail that
25 included a video with images of Xu Jin's mother and sister

1 hysterically crying.

2 Liu Fang and her daughter checked in with each other
3 every single day, sometimes doing something as simple as just
4 texting an emoji to the other, just to confirm that the other
5 was still safe. This was a relentless campaign by the Chinese
6 Government to scare Xu Jin and Liu Fang into returning to
7 China.

8 And each of the defendants, Michael McMahon,
9 Zhu Yong and Congying Zheng, knowingly participated in that
10 campaign. They surveilled, they stalked, they threatened, and
11 they terrified. What the defendants did was against the law,
12 and it's time to hold them accountable for their conduct.

13 Ladies and gentlemen, when this trial began, the
14 Government told you that the evidence would show that each of
15 the defendants knowingly acted at the direction of the Chinese
16 Government and that they stalked the victims in this case.
17 The evidence that you have seen and heard has proven exactly
18 that.

19 This morning, I'll summarize that evidence for you.
20 And I'll explain how it demonstrates that each of the
21 defendants is guilty of each of the four charged crimes. I'm
22 not going to review everything because I know you paid
23 attention. And, as Judge Chen said, you'll have the evidence
24 when you deliberate and you can request the transcripts of the
25 witness testimony.

1 I will briefly note, though, that on my slides,
2 those won't be in evidence so they won't go back with you. So
3 if there's a particular exhibit you would like to review more
4 closely, you should write down the exhibit number. It will be
5 on the bottom of the slide. In a moment, I'll walk you
6 through the key events.

7 As you've heard over the past two weeks, these
8 events are largely undisputed. After I've talked about the
9 key events, I'll talk about the charges against the
10 defendants, what those charges mean, and how we have proved
11 each of those charges beyond a reasonable doubt.

12 As I do that, I'll focus on what really are the
13 issues in dispute here, defendant's knowledge, and their
14 intent.

15 As you learned over the past two weeks, the Chinese
16 Government, through the work of the defendants and their
17 co-conspirators, carried out a multiyear campaign to harass
18 and intimidate the victims in order to coerce them to return
19 to China. In September 2016, the Chinese Government directed
20 Defendant Zhu Yong to hire Defendant Michael McMahon, a
21 private investigator and former NYPD officer, to locate
22 Xu Jin.

23 Looks like it's cut off on the screen, but that's a
24 timeline bubble for September 2016. Zhu Yong, who was in
25 direct contact with Chinese Government official, Sun Hui,

SUMMATION - MS. ARFA

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1 right over here where the political commissar are in China,
2 Zhu Yong hired McMahon to locate Xu Jin and his family. It
3 was Zhu Yong who signed McMahon's retainer agreement. It was
4 also Zhu Yong who initially paid McMahon. This is the
5 retainer agreement.

6 And as you can see here, this is GX 1020, Zhu Yong
7 already possessed highly sensitive information about the
8 victims, including, as you can see -- well, maybe you can see.
9 It's pretty small, their social security number, their birth
10 dates, and their green card numbers. And at the bottom of
11 that first page and top of that second page, you can also see
12 that he possessed information that related to Chinese travel
13 information.

14 Ladies and gentlemen, that was information that
15 could only have come from the Chinese Government. That highly
16 sensitive information in that document is why, beginning in
17 October 2016, Zhu Yong provided to Michael McMahon to help him
18 track down the victims. As we'll discuss later, McMahon knew
19 exactly what was going on right from the beginning. He did
20 some basic research and he almost immediately found a
21 newspaper article and other information that made clear,
22 exactly why he had been hired to find Xu Jin. It was because
23 the Chinese Government wanted to arrest Xu Jin and force him
24 to return to China.

25 Bless you.

1 Despite learning that Xu Jin was wanted by the
2 Chinese Government, in early October 2016, McMahon began
3 researching Xu Jin and conducting surveillance of Xu Jin's
4 family. McMahon was doing that for Zhu Yong, the defendant,
5 and for his Chinese Government counters. As you can see here,
6 this is GX 1034, '36, and '37, McMahon surveilled Xu Jin's
7 sister-in-law and took photos of her. McMahon sent those
8 photos to the interpreter who then passed them on to Zhu Yong.
9 And you can see that in this e-mail in which the interpreter
10 informed McMahon that his update had been provided to Mr. Zhu.

11 In late October, the Chinese Government officials
12 directing this scheme escalated their efforts. They began a
13 more hands-on approach. On October 27, Zhu Yong and his
14 co-conspirator, Hu Ji, right here, the Chinese police officer,
15 traveled from China to meet with McMahon.

16 That meeting happened, as you heard, at a Panera
17 Bread in New Jersey. Zhu Yong and Hu Ji both traveled to the
18 United States in late October. That's confirmed in this
19 exhibit, GX 402Y. And the day leading up to that meeting at
20 Panera Bread with McMahon, Zhu and Hu Ji, they spoke many
21 times. You can see that in GX 316.

22 The meeting at Panera Bread was captured in this
23 photo of the three conspirators, standing arm in arm. The
24 photo is GX 902E. This is Defendant McMahon in the middle,
25 Defendant Zhu Yong on the left and Hu Ji, the Chinese police

1 officer on the right.

2 Zhu Yong and Hu Ji didn't travel from China to New
3 Jersey just to take a quick photo. The reason for the meeting
4 was obvious. They wanted to have a detailed conversation
5 about the ongoing plan to harass Xu Jin and Liu Fang in order
6 to force them to return to China.

7 In November 2016, McMahon began receiving direction
8 directly from the Chinese Government, via Eric Yan, who, as
9 you know, is the same Hu Ji, the Chinese police officer with
10 whom McMahon had met only a few weeks previously at the Panera
11 Bread. The information requested from McMahon became even
12 more invasive and more obviously geared toward harassment and
13 intimidation.

14 For example, Hu Ji requested that McMahon obtain
15 Liu Fang's travel information and information about their
16 college-aged daughter. McMahon provided that information as
17 you can see, in GX 2033. The information that McMahon
18 provided, as I'll talk about more later, included sensitive
19 U.S. Government information about people living here in the
20 United States.

21 McMahon improperly got that information from a law
22 enforcement friend and then gave it to a Chinese Government
23 official. And while McMahon was conducting surveillance and
24 gathering sensitive personal information about the victims,
25 another man conveyed to the victims exactly what the Chinese

1 Government was doing.

2 That man passed along a message for Xu Jin that to
3 protect his family, his only options were to return to China
4 or kill himself. This is Liu Yan's testimony. As she told
5 you, he said, If you don't go back, then your family members
6 will be in trouble. If you want to resolve this issue,
7 there's only two ways: Either you go back to China on your
8 own and admit the crime or you disappear.

9 And then she told you what that meant. What
10 disappear meant. She told you that meant asking him to die on
11 his own. That's Pages 78 to 79 in the transcript. And that
12 right there is the Chinese Government ratcheting up the
13 pressure.

14 In December 2016, McMahon sent Hu Ji a report about
15 Xu Jin's daughter. During her testimony, Xu Jin's daughter
16 identified most of the addresses in the reports that McMahon
17 sent as addresses of which she had lived previously. You can
18 see that in these exhibits, GX 3063, 3065, 713, and
19 Sabrina Xu's testimony at Pages 15 to 16.

20 In the spring of 2017, the Chinese Government
21 escalated things further. That's when Chinese Government
22 officials, together with McMahon and several conspirators,
23 exploited the victim's elderly father to locate and harass the
24 victims. In March 2017, Hu Ji told McMahon about this new
25 phase of the harassment campaign, Hu Ji told McMahon that

SUMMATION - MS. ARFA

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1 Xu Jin's father would be traveling from China to New Jersey to
2 the home of Liu Fang's sister and asked McMahon to follow
3 Xu Jin's father in order to try to find Xu Jin himself. Hu Ji
4 asked McMahon whether he would accept this job or not. You
5 can see it in the exhibits. McMahon accepted.

6 On April 3rd, 2017, Tu Lan -- Tu Lan, the Chinese
7 prosecutor who was tasked with bringing Xu Jin back to China,
8 she traveled from China to New Jersey, along with
9 co-conspirator Johnny Zhu, right down here. They met with
10 Hongru Jin who, as you heard, acted among other things as a
11 driver for the various Chinese officials when they came to the
12 United States in connection with this harassment campaign.

13 The co-conspirators gathered in a hotel, and they
14 discussed the plan to harass and surveil Xu Jin and his
15 family. And we know that because a lengthy portion of the
16 meeting was recorded. The plan they discussed that night
17 involved a number of participants and it occurred over several
18 days.

19 The plan was this: Xu Jin's father would fly into
20 the United States, and he would do so along with a doctor, to
21 ensure that the elderly man would survive the trip. Johnny
22 Zhu would take the father to the home of Xu Jin's
23 sister-in-law and then leave him there. The father would then
24 try contacting Xu Jin to convey the Chinese Government's
25 demands that Xu Jin return to China. And while all of this

1 was happening, McMahon and Hongru Jin would be performing
2 surveillance in order to try to locate Xu Jin and figure out
3 where he lived by following his father. At that meeting at
4 the hotel, Chinese prosecutor Tu Lan and Johnny Zhu discussed
5 McMahon.

6 Tu Lan was emphatic. She directed Johnny Zhu to
7 tell McMahon everything. She said, and I quote, Tell him
8 clearly, I mean, you need to tell him clearly about
9 everything. You can see that in GX 704A.

10 The next day, on April 4th, 2017, the team began
11 carrying out that plan. Johnny Zhu met with McMahon at the
12 same place he had met with Zhu Yong and Hu Ji previously, the
13 Panera bread in New Jersey. They met for nearly an hour. You
14 can conclude that at that meeting, just as Tu Lan directed,
15 Johnny Zhu told McMahon everything. And to ensure that
16 McMahon would carry out his role in this obviously illegal
17 scheme, Johnny Zhu paid McMahon \$5,000 in cash.

18 On April 5th, 2017, Xu Jin's father arrived in the
19 United States as planned. This is Xu Jin's father, Xu Cewei.
20 At the time, he was 82 years old, and he had recently suffered
21 a brain hemorrhage. He was forced to travel to the United
22 States accompanied by Dr. Li Minjun, a retired doctor.

23 Xu Jin's father was given a task, find his son,
24 Xu Jin, and persuade Xu Jin to return to China. That task was
25 given to him by Tu Lan, the Chinese prosecutor. And you heard

1 about that task from Liu Fang in her own words. She
2 testified, He, meaning her father-in-law, said that Tu Lan and
3 others forced him to come to the U.S., he did not want to
4 come, and he was also given a task, he must return to China
5 with his son, yeah, to persuade his son to return to China.

6 And then she clarified what that task was. She told
7 you, they wanted him to meet with his son, and he must see
8 him, and he has to persuade the son to return to China with
9 him together. That's Liu Fang's testimony, Pages 697 to '99.

10 The reason Xu Jin's father made that dangerous trip
11 was because he feared for the safety of his wife and his
12 daughter in China. His daughter, in fact, had previously been
13 jailed when Xu Cewei, the father refused to make the trip.

14 That's his daughter right there who's Xu Jin's
15 sister, Xu Qin. Let's look what Xu Jin told you about that.
16 He said, And Tu Lan from the prosecutor's office in Wuhan told
17 my father that if he did not accompany them to the U.S., then
18 my younger sister would be sent to jail. Page 1392 of the
19 transcript. After he arrived in the United States, Xu Jin's
20 father was dropped off at the home of Xu Jin's sister-in-law,
21 just as the conspirators planned. Xu Jin's father was
22 literally left on her door. That's Liu Yan, sister-in-law.

23 The reason the Chinese Government officials left the
24 father at the home of the sister-in-law was because they
25 didn't have an address for Xu Jin. They had his

1 sister-in-law's address, though, and so they used Xu Jin as
2 bait. And the plan worked. Because Michael McMahon was
3 watching. He followed Xu Jin's father to a meeting with
4 Xu Jin and then he followed Xu Jin home from that meeting.

5 By April 6th, just one day after Xu Jin's father
6 arrived in the United States, McMahon was able to do what the
7 Chinese Government had not been able to do thus far, he was
8 able to locate Xu Jin.

9 This is McMahon texting Johnny Zhu with Xu Jin's
10 address. That's the redacted box there. But you can see the
11 un-redacted version in GX 805B. And GX 2002 is a photo of
12 Xu Jin's home that McMahon sent to Johnny Zhu that very day.
13 McMahon, of course, knew the overall purpose of this multiday
14 scheme. He knew the purpose was to coerce Xu Jin to return to
15 China. And when the scheme wasn't progressing quickly enough,
16 he suggested more direct meshes. On April 11, 2017, he texted
17 Johnny Zhu, I think if we harass Xu, park outside his home and
18 let him know we are there, I did that before on another case.
19 That's GX 805B.

20 And let's be clear about what we're talking about
21 here. This is Michael McMahon suggesting to a representative
22 of the Chinese Government that they harass Xu Jin, in those
23 words, because if an appeal from an elderly man forced to
24 travel halfway around the world wasn't going to be enough to
25 convince Xu Jin, then perhaps knowing that an armed

1 investigator was sitting right outside would be enough.
2 Perhaps that would be the thing that scared him back to China.
3 Johnny Zhu said no to that particular harassment technique,
4 but the Chinese Government did continue its harassment
5 campaign. They just did it through other methods of stalking
6 and intimidation, and they continued to use McMahon to do it.

7 The next day, Xu Jin's father was permitted to
8 return to his wife and his daughter in China. But Xu Jin
9 didn't go with him and so the Chinese Government's efforts
10 continued. Less than two weeks later, Hu Ji, again, the
11 Chinese police officer, e-mailed McMahon to thank him for
12 getting Xu Jin's address. And then he said that now we needed
13 information in connection with the girl related to Xu Jin's
14 daughter.

15 Having located Xu Jin, there was no legitimate
16 purpose for seeking information about Xu Jin's daughter. This
17 was about continuing to find ways to harass Xu Jin. Zhu Yong
18 went to the home of Xu Jin's sister-in-law and took photos.
19 And you can see here this is a photo that includes her license
20 plate. And these were photos that were found on his phone.
21 And just a few days after taking these photos, Defendant Zhu
22 Yong returned to China. We know that from the travel record,
23 you can see.

24 And then a month later, there was yet another effort
25 to harass Xu Jin. This time it was targeted at his daughter,

1 Sabrina. That's Sabrina, who also goes by Xu Xinzi. Facebook
2 messages were sent to her friends accusing her parents of
3 wrongdoing and accusing her of benefiting from that
4 wrongdoing. In the summer of 2018, her friends starting
5 receiving those messages, disparaging her and her family.
6 And, as she testified, she felt threatened that the Chinese
7 Government had found her friends and sent those messages. She
8 told you that the messages made her feel stressed and unsafe.
9 She told you they made her feel worried about her family.
10 That's GX 713 at Pages 22 to 23.

11 In September 2018, the Chinese Government finally
12 agreed with McMahon and further escalated their threats.
13 Taking advantage of the address for Xu Jin that McMahon had
14 obtained, the Chinese Government sent two people to his home
15 to threaten and intimidate him.

16 On September 4th, 2018, Defendant Congying Zheng,
17 along with Vincent Kuang, drove from Brooklyn to New Jersey to
18 deliver another message from the Chinese Government.
19 Defendant Zheng, leading the charge, walked up Xu Jin's
20 driveway, went to his front door, pounded on that front door.
21 When no one answered, and he couldn't open the door because it
22 was locked, he taped to the door three threatening notes. And
23 then he let Kuang to the back of the house, walking up the
24 backyard and up the patio where, as you can see from those
25 exhibits which are GX 709A and 108, he peered inside their

1 home. And you've seen what the note said, if you're willing
2 to go back to mainland -- which you've heard means China --
3 and spend 10 years in prison, your wife and children will be
4 safe. That's the end of this matter.

5 Congying Zheng and Vincent Kuang then quickly
6 returned to take down two of the notes, not because they felt
7 badly, not because it was wrong, but because the person who
8 had told them to post the notes was concerned that leaving
9 three notes on the front door might draw attention. He was
10 concerned it might be seen by a neighbor and cause problems.

11 So they came back and they took down two of the
12 notes and they threw them on Xu Jin's lawn. But they left
13 that third threatening note on the door, on the front door,
14 for Xu Jin and Liu Fang to see. This is the note they left.
15 And these are the other two notes that were found on the lawn.

16 Just as they intended, Xu Jin and Liu Fang did see
17 this note. And this is 50 -- '51. They were home when Zheng
18 was pounding on the door. And after he left, they quickly
19 found the note. And as they told you, they were terrified by
20 it.

21

22 (Continued on the following page.)

23

24

25

1 (Continuing.)

2 MS. ARFA: But even though they were scared, Xu Jin
3 and Liu Fang still didn't return to China, and the Chinese
4 Government's efforts continued.

5 In 2019, Liu Fang's sister, Liu Yan, started
6 receiving numerous unsolicited and unwanted mailings from
7 China. They supposedly were from Xu Jin's sister. But Liu
8 Fang's sister, and Xu Jin and Liu Fang themselves, knew
9 better. They knew that those mailings were the latest in the
10 Chinese Government's efforts to try to force Xu Jin and his
11 wife to return to China.

12 These were some of the mailings. This is GX 5072
13 and 506. You saw the contents of one of those mailings, that
14 DVD. That was the video you saw a few days ago. That was the
15 video of Xu Jin's mother and sister crying. It was deeply
16 upsetting, just as it was supposed to be.

17 Ladies and gentlemen, the events I just described
18 make clear that Xu Jin and Liu Fang were harassed and stalked
19 for years. This was a broad and long-lasting experience to
20 coerce Xu Jin and Liu Fang to return to China through threats
21 and intimidation.

22 Every person on this board, including the
23 defendants, played a role in this conspiracy. Every one of
24 them shared the goal of harassing Xu Jin and Liu Fang into
25 going back to China. The defendants each participated in that

1 overarching conspiracy. They played different roles at
2 different times, but they were all involved. They all shared
3 that common goal. In doing so, the defendants each committed
4 four separate crimes. Those crimes fall into two buckets.

5 First: The defendants each acted as an illegal
6 agent of a foreign government; and separately, they conspired
7 to commit that crime.

8 Second: The defendants each committed the crime of
9 interstate stalking; and separately, they conspired to commit
10 that crime.

11 I've talked generally about what the evidence in
12 this trial has shown. In a moment, I'll walk through how the
13 evidence proves each defendant's guilt beyond a reasonable
14 doubt on each of those four charges. As I do that, I'll
15 discuss some of the law, which I expect Judge Chen will
16 instruct you about. To the extent anything I say is
17 inconsistent with anything Judge Chen instructs you, you, of
18 course, should please follow Judge Chen's instructions.

19 I'm going to start with the interstate stalking
20 charges, which are relatively straightforward.

21 The evidence has shown that the defendants each
22 shared a common goal of harassing and intimidating Xu Jin and
23 Liu Fang. That's exactly what each of them did. And just to
24 be clear, neither of these two charges requires proof that the
25 defendants knew that they were working at the direction of the

1 Chinese Government.

2 Let's look first at the interstate stalking charge,
3 which is Count Four. The elements to this charge, as you can
4 see, are:

5 First: That the defendant traveled in interstate or
6 foreign commerce.

7 Second: The defendant did so with the intent to
8 harass or intimidate, or to place under surveillance with the
9 intent to harass or intimidate Xu Jin or Liu Fang.

10 Third: In the course of doing so, the defendant
11 caused, attempted to cause, or reasonably expected to cause
12 substantial emotional distress to Xu Jin, Liu Fang, or another
13 member of either of their immediate families.

14 This is Count Three, the conspiracy to commit
15 interstate stalking charge. I expect Judge Chen will instruct
16 you that a conspiracy is simply an agreement. The elements of
17 Count Three are:

18 That there was an agreement to commit interstate
19 stalking.

20 The defendant knowingly and intentionally joined
21 that agreement.

22 And third: That any member of that conspiracy took
23 some step or act, which could be as simple as a phone call or
24 an email, in furtherance of that agreement.

25 If you find those elements satisfied, you must find

1 the defendants guilty of this count.

2 But to find the defendants guilty of this count,
3 Count Three, you do not need to find that anyone actually
4 carried out the interstate stalking, the interstate
5 intimidation, the harassment. Here, it's the agreement itself
6 to harass or to intimidate that's the crime.

7 Let's look now at each of the defendants, starting
8 with the evidence that proves that McMahon and Zhu Yong
9 engaged in interstate stalking.

10 As you know, Zhu Yong and McMahon were primarily
11 responsible for the scheme to bring Xu Jin's father from China
12 to New Jersey to coerce the victims to return to China. As we
13 told you in our opening, McMahon himself did not travel
14 between states or internationally, but he clearly aided and
15 abetted others who did so, including Johnny Zhu and Tu Lan,
16 and he did that with the intent of harassing the victims and
17 causing them substantial emotional distress.

18 McMahon's agreement to stalk Xu Jin when his father
19 arrived was critical to Tu Lan's plan to finally find Xu Jin's
20 home address. As we talked about earlier this morning, in
21 October 2016, the evidence shows that Zhu Yong traveled back
22 and forth from China to the United States and back again. And
23 he did that as he helped the Chinese Government officials,
24 like Hu Ji, gather information that the Chinese Government
25 could use to carry out its stalking scheme against the

1 victims.

2 Zhu Yong put the wheels in motion for the April 2017
3 surveillance in early October 2016. As you saw, during this
4 period, Zhu Yong was already sending McMahon information on Xu
5 Jin's father. He knew the goal was to lever Xu Jin's father
6 to coerce Xu Jin to return to China. You can see on here,
7 this is the information sheet that he provided to McMahon. It
8 says: Jin Xu's parents will leave the states on October 6th,
9 and it provides information about their travel plans. Then it
10 suggests that someone follow them.

11 And, in fact, Zhu Yong admitted to knowing about
12 this scheme in his post-arrest interview.

13 As you know, later in October, both Hu Ji and Zhu
14 Yong traveled from China to the United States in order to meet
15 with McMahon. After that meeting, McMahon provided
16 information he improperly obtained from databases for the U.S.
17 Department of Homeland Security about the victims, and he
18 passed that information to Chinese officials for use in
19 further actions.

20 In April 2017, several more conspirators, working
21 alongside McMahon and with information and resources gathered
22 by Zhu Yong, again traveled across international and state
23 borders, this time with Xu Jin's father, and this time,
24 clearly to engage in direct harassment and intimidation.

25 McMahon may not have traveled outside of New Jersey

1 himself, but he engaged in critical affirmative steps, such as
2 surveillance of Liu Yan's home on the day his father was
3 brought here. Those critical steps helped to ensure the
4 success of this part of the stalking campaign. McMahon
5 admitted in his post-arrest interview that he knew his
6 co-conspirators traveled internationally to stalk Xu Jin and
7 Liu Fang.

8 You can see he said: And then the father had flown
9 in from, I think he said, China to convince the son because
10 of, you know, out of honor for the name. That's GX 701-A.
11 McMahon knew what it meant. He knew that meant the father was
12 brought across international lines as an intimidation and
13 harassment tactic to force Xu Jin back to China.

14 Not only was this end goal apparent to McMahon, but
15 he must also have explained it to the private investigator who
16 you heard testimony from, Eric Gallowitz. You saw the
17 evidence that the two of them joked about an abduction as they
18 were waiting for further orders from Chinese officials about
19 surveilling Xu Jin.

20 You see Gallowitz asked: Further surveillance?

21 McMahon responds: Not sure. Waiting for a call.

22 Gallowitz responds: Yeah, from New Jersey State
23 Police about an abduction.

24 McMahon responds: LOL. Laugh out loud.

25 You also saw a text in which Gallowitz proposed to

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1 McMahon that the surveillance be escalated, that it go overt
2 to more easily achieve the end goal here, scaring the victims
3 into returning to China.

4 You can see he says: Maybe overt surveillance. In
5 their face. Sit in front of the house. Pictures. Video.
6 Scare them.

7 McMahon doesn't respond and say, no, absolutely not,
8 that's a terrible idea. He says: Yeah, possibly.

9 And of course you have McMahon's text to Johnny Zhu
10 in which McMahon himself directly proposes that they harass Xu
11 Jin. Look at the text. We read this earlier. McMahon says:
12 I think if we harass Xu, park outside his home and let him
13 know we are there.

14 McMahon sent that text because he understood the
15 purpose of the international harassment campaign. He didn't
16 just work for Johnny Zhu and his co-conspirators; he worked
17 with them to try to make their harassment campaign more
18 successful.

19 And when McMahon was asked about his role in
20 stalking the victims, he lied about what he did and he
21 pretended that communication you just saw, the one in which he
22 suggested harassing Xu, was a typo.

23 McMahon: I don't know why I would even say
24 something like that unless it was a typo or something.

25 It wasn't a typo. It was McMahon trying to cover

1 his tracks.

2 The interstate and foreign travel here is obvious.
3 The intent to intimidate and harass is clear. And of course,
4 the expectation of substantial emotional distress from the
5 coordinated scheme involving Xu Jin's father was not just
6 reasonable to expect; it was the entire purpose of the scheme.
7 And it wasn't just a purpose; it actually happened.

8 This element is proven.

9 As you heard from Xu Jin, his father was elderly and
10 in poor health. In fact, as I told you, he was -- or as he
11 told you, Xu Jin told you, his father was in such poor health
12 that even the Chinese Government had a retired doctor to
13 accompany him. They were worried he might die. And if he did
14 die, he wouldn't be able to accomplish the Chinese
15 Government's mission.

16 The father's forced trip to New Jersey from China
17 was shocking and distressing to Xu Jin's entire family. He
18 told you: It was because earlier in that year my father had
19 the surgery done and his health condition had been weakened,
20 and previously he had a brain hemorrhage and started saying
21 that he's getting headaches. My family members were very
22 concerned and worried about his conditions. However, under
23 such conditions, he was still being forced to come to the U.S.
24 It was very shocking. The first of all, it was very shocking
25 for me to see that being done and, secondly, I was very angry.

1 The forced visit of Xu Jin's father made absolutely
2 clear that every day that Xu Jin did not return to China, his
3 family would suffer more and more. Because of that, Xu Jin
4 told you that he lives in fear.

5 He said: When my father returned to China, they
6 sent my younger sister to the jail again.

7 QUESTION: And does that make you feel frightened?
8 Yes, I'm worried.

9 Substantial emotional distress is proven.

10 Let's talk now about the evidence related to Zheng's
11 guilt of interstate stalking. That evidence is also
12 clear-cut. Congying Zheng and Vincent Kuang drove an hour in
13 their car from Brooklyn to New Jersey to the Xu family home.

14 The interstate travel element is proven.

15 When they got there, Congying Zheng and Vincent
16 Kuang invaded the property of Xu Jin and Liu Fang, and they
17 posted the threatening notes. I showed you earlier the note
18 they left. And make no mistake, defendant Zheng was not an
19 unwilling follower, as he falsely claimed in his post-arrest
20 interview. He was first one up the driveway. He was the
21 first one to the front door. He was the first one on the
22 deck. He was the one holding the table dispenser. And he was
23 the person who taped the note on the door, the note that
24 threatened the safety of Xu Jin and his entire family. When
25 Zheng did that, he knew exactly what he was doing, and didn't

1 ask any questions when he did.

2 You heard Vincent Kuang tell you -- or he was asked:
3 Up until this point on September 4, 2018, did you observe
4 Zheng looking confused?

5 Kuang answered: No.

6 QUESTION: Did you observe Zheng appearing nervous?

7 ANSWER: No.

8 Go back and look at the photos and the video in GX
9 709, and in every video clip and every photo we showed you,
10 and they're in evidence, you'll see from every one it is Zheng
11 who is leading the effort to threaten the Xu Jin family that
12 day.

13 Ladies and gentlemen, the threatening note speaks
14 for itself. What other reasonable expectation could there be
15 from reading that note than to cause the reader to fear for
16 his family's safety? That's what the note said, and that's
17 what the note did.

18 Again, the interstate and foreign travel element is
19 proved here for Zheng.

20 And of course, the expectation of substantial
21 emotional distress wasn't just reasonable to expect; it
22 actually happened. You heard about that from both Liu Fang
23 and Xu Jin. Liu Fang described for you the fear she felt when
24 the two men, including the defendant Zheng, pounded at her
25 door and peered inside her home window.

1 She said: Their arrival made me feel like even
2 though it was under broad daylight and I stayed in my home and
3 locked my door, I was still very unsafe.

4 You heard from Xu Jin who explained the trauma of
5 the threat escalating from being a mental one to now a fear of
6 a physical threat, both to him and his family.

7 He told you: When I saw that note, my reaction at
8 the time was that I had two feelings. Before I saw this, I
9 felt that the threats from the Chinese Communist Party was
10 only a mental threat to me. However, when I saw that note, I
11 realized that it had become a physical threat and is close
12 first to my life. That is how I feel at the time.

13 This count is proven with respect to Zheng. We've
14 demonstrated all three elements.

15 And of course, those discrete acts of interstate
16 stalking were part of a much larger conspiracy to engage in
17 interstate stalking. We've already gone over the evidence of
18 the invasive surveillance of the victims that Zhu Yong and
19 Chinese officials commissioned to McMahon beginning in 2016.
20 We've already gone over the forced visit of Xu Jin's father in
21 April 2017 from China to New Jersey. We've gone over
22 McMahon's surveillance of Xu Jin that followed. And we've
23 gone over the threatening note that Congying Zheng left at the
24 Xu family home.

25 You also heard about the harassment of Sabrina Xu,

1 Xu Jin and Liu Fang's daughter, on Facebook, and you heard
2 about the series of mailings with letters and videos that Liu
3 Yan, Xu Jin's sister-in-law, received at her home in 2018.
4 There is a clear escalation over time in the harassment
5 campaign.

6 Every defendant sitting at that table actively
7 participated in that harassment campaign. The interstate
8 stalking campaign traumatized the victims, traumatized their
9 families. Liu Yan, Xu Jin's sister-in-law, told you that she
10 had no proper words to describe the mental pain we have
11 suffered.

12 And then she told you: My sister, my older sister
13 was almost collapse, on the verge of collapsing. She could
14 not eat, could not sleep, and getting thinner and thinner.
15 Yeah, I was scared that she would not be able to take it
16 anymore. She's distant away from all the Chinese people and
17 friends from who -- who are from China. She distance or
18 disconnected himself with family.

19 That's transcript page 126.

20 And Liu Fang herself described how her life was
21 turned upside down, 180 degrees, overnight. That's
22 transcript pages 732 and 33.

23 And then you heard Liu Fang describe how she told
24 her daughter to send her an emoji every day just to let her
25 know that she was safe: I am also very concerned about the

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1 safety of my daughter, she told you. Therefore, I ask my
2 daughter from then on to send me a message every day, no
3 matter how busy she was, even though an emoji would do, just
4 to say that she's safe. That's transcript page 730.

5 We have proven Count Three, conspiracy to engage in
6 interstate stalking, with respect to all three defendants.

7 Let's look now at the charges that the defendants
8 were acting as illegal foreign agents. Again, I'm going to
9 begin with Count Two, which is the count that they acted as
10 illegal foreign agents, and then I'll go back to the
11 conspiracy count, which is Count One.

12 I expect that Judge Chen will instruct you that the
13 elements of Count Two are:

14 First: The defendant acted as an agent of the
15 Chinese Government or a Chinese Government official.

16 Second: The defendant failed to notify the Attorney
17 General that he would be doing so.

18 Third: The defendant acted knowingly.

19 Fourth: The defendant acted, at least in part, in
20 the United States.

21 I also expect that Judge Chen will instruct you that
22 an agreement to act as an illegal agent does not need to be a
23 formal or contractual agreement. The agent doesn't have to
24 receive payment or compensation. A mutual understanding is
25 sufficient.

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1 I also expect that Judge Chen will instruct you that
2 agreeing to act at the direction of a foreign government does
3 not require that the agent or the defendant is essentially
4 acting as an employee of the foreign government. You can act
5 under the direction of a foreign government in a more
6 hands-off way and still be acting as an agent.

7 With respect to Count One, I expect Judge Chen will
8 instruct you that the elements are:

9 First: There was an agreement to act at the
10 direction of the Chinese Government without notifying the
11 Attorney General.

12 Second: The defendant knowingly and intentionally
13 became a member of that agreement.

14 Third: An overt act was committed in furtherance of
15 that agreement.

16 Similarly to the charge that defendants conspired to
17 commit interstate stalking, here, to find the defendants
18 guilty of Count One, you do not need to find that anyone even
19 acted at the direction of the Chinese Government. As I
20 explained earlier, it's the agreement that is the crime here.

21 Let's discuss the evidence relating to Count Two.
22 There's no dispute that the overarching campaign to harass and
23 intimidate Xu Jin and Liu Fang, the victims, was directed by
24 the Chinese Government. The officials of the Chinese
25 Government involved in that harassment campaign --

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1 MR. GOLDBERGER: I object to that last statement.

2 THE COURT: Hold on one second.

3 Overruled.

4 Remember, ladies and gentlemen, this is argument and
5 it is the Government's belief about or their view of the
6 evidence, and the defense will have the opportunity to provide
7 any rebuttal, or their view of the evidence. So remember, it
8 is simply argument.

9 Go ahead.

10 MS. ARFA: The Chinese Government officials involved
11 in the harassment campaign included every single official in
12 this top row: Li Feng, an officer; Hu Ji, a policeman; Sun
13 Hui, a political commissar; Xiao Jun, the chief prosecutor; Tu
14 Lan, the prosecutor.

15 There's no dispute that the defendants did not
16 provide any notification. So as I expect Judge Chen will
17 instruct you, being an agent of a foreign government means
18 that an individual other than a diplomatic or consular
19 official or attache is agreeing to operate subject to the
20 direction or control of a foreign government or official.

21 We know from DSS Special Agent Matthew McGuire's
22 testimony that none of the defendants were diplomats or
23 consular officials. We also know from much the same evidence
24 that we've already talked about that Zhu Yong, Michael
25 McMahon, and Congying Zheng were acting under the direction or

1 control of the Chinese Government.

2 MR. GOLDBERGER: Objection. That's not the
3 evidence.

4 THE COURT: Overruled. You'll have your opportunity
5 to make your argument, as well.

6 This is the Government's argument, again, ladies and
7 gentlemen.

8 Go ahead.

9 MS. ARFA: Zhu Yong acted at the direction of Sun
10 Hui, Hu Ji, and others at the Chinese Government to initiate a
11 surveillance of the victims and to obtain McMahon in September
12 and October of 2016. McMahon acted under the direction of Hu
13 Ji, Tu Lan, and others in the Chinese Government, including
14 intermediaries Zhu Yong and Johnny Zhu when he conducted
15 surveillance on the victims, including in April 2017, when Xu
16 Jin's father was forcibly brought to the United States.

17 McMahon also accessed U.S. Government databases at
18 the direction of Hu Ji and through Zhu Yong. That information
19 provided detailed travel records, as well as other personal
20 information about the victims and his co-conspirators --
21 excuse me, about the victims that he received from his
22 co-conspirators.

23 McMahon was paid over \$19,000 for that work.

24 Congying Zheng acted under the direction of the
25 Chinese Government through intermediaries when he threatened

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1 Xu Jin in September 2018, telling him that if he served 10
2 years in a Chinese prison, his wife and children would be
3 okay.

4 I expect Judge Chen will instruct you that if the
5 evidence proves that any of the defendants acted at the
6 direction of the Chinese Government for any period of time
7 between September 2016 and December 2019, then you must find
8 them guilty of Count Two. In other words, you do not need to
9 find that the defendant was an agent during the entire period
10 charged in the indictment.

11 The first element of Count Two is proven.

12 With respect to the second element, there's no
13 dispute that none of the defendants notified the Attorney
14 General. In fact, the parties have stipulated to that. That
15 means all the parties agree that's true and that's in
16 evidence.

17 There's also no dispute that the defendants acted,
18 at least in part, within the United States. The surveillance,
19 the harassment, the intimidation, that occurred in New Jersey
20 and it occurred in New York. The only real issue in dispute
21 for this count is whether the defendants knew they were
22 working for the Chinese Government, whether they knew they
23 were acting at the direction of the Chinese Government, and
24 whether the defendants agreed to do it. And the evidence has
25 shown that each of the defendants knew exactly who they were

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1 working for. They knew they were working for the Chinese
2 Government.

3 Let's begin with Zhu Yong. You've seen a lot of
4 evidence that Zhu Yong was acting at the direction of the
5 Chinese Government. We've talked about much of that evidence
6 already, and I'm not going to go through it in detail again,
7 so let me just summarize it.

8 In September 2016, while he was in China, Zhu Yong
9 arranged for McMahon to be hired. Zhu Yong signed a retainer
10 agreement. Zhu Yong made the initial payment to McMahon with
11 a check, with a memo line that specifically says: Retainer
12 fee from, paid by Jason Zhu a/k/a Yong Zhu, meaning Zhu Yong.
13 Zhu Yong provided McMahon with incredibly sensitive
14 information about the victims, as we've seen. Zhu Yong then
15 received regular updates with McMahon's findings. Zhu Yong
16 went to the meeting at the Panera Bread with McMahon and Hu
17 Ji, the Chinese police officer.

18 Later on, after McMahon obtained Xu Jin's address,
19 it was Zhu Yong who conducted additional surveillance at the
20 home of Xu Jin's sister-in-law, Liu Fang, and he did that
21 just days before he returned to China.

22 Rather than going through that evidence again, let
23 me focus on the evidence that Zhu Yong knew he was working for
24 the Chinese Government.

25 As early as August 2016, Zhu Yong was working for

1 the Chinese Government to find a private investigator who
2 could help the Chinese Government with finding Xu Jin. Once
3 Zhu Yong got information about Private Investigator McMahon in
4 the United States, he passed that information along to Sun
5 Hui, the Wuhan Public Security Bureau political commissar. He
6 is unquestionably a Chinese Government official. And you know
7 that not only from GX 431-K, but you know that from Defendant
8 Zhu Yong's Exhibit A, which is an email that he sent to Sun
9 Hui. You know that because you know his email address, you've
10 seen Zhu Yong's email address. It's reflected on here.

11 Zhu Yong became the middleman between the Chinese
12 Government and Private Investigator McMahon. His contact
13 information was even saved in one of the co-conspirator's
14 phones as "Middleman." This is GX 901-D. You can see it, Zhu
15 Yong's photo on the left, the profile photo, it's the same one
16 that was entered into evidence, and the email address that we
17 know belongs to him.

18
19 (Continued on the next page.)
20
21
22
23
24
25

1 (Continuing.)

2 MS. ARFA: Zhu Yong was listed as the middleman
3 because that's exactly what he was; he was a middleman between
4 Michael McMahon and the Chinese government.

5 When Zhu Yong first hired McMahon, Zhu Yong told the
6 translator that he, meaning Zhu Yong, was looking for Xu Jin,
7 Zhu Yong said, because Xu Jin owed him money. You can see
8 that in GX 3011. This is an e-mail from the translator
9 saying: Jin Xu is a gentlemen who owed -- that's a typo, but
10 owed a lot of money for Mr. Jason Zhu. That was a lie and
11 Zhu Yong obviously knew it was a lie. He knew that Xu Jin
12 didn't owe him money. He knew that the Chinese government was
13 hunting down Xu Jin in an effort to force him back to China.

14 And in following weeks, Zhu Yong provided this
15 highly sensitive information about a victim to McMahon,
16 including Exit & Entry Permit records for Hong Kong and Macao,
17 Chinese I.D. numbers and Chinese family travel information.
18 That's information that could only have been gotten by the
19 Chinese government. "From." I should say "from" the Chinese
20 government.

21 And Zhu Yong obviously knew that the information was
22 coming from the Chinese government, given his repeated
23 contacts with Chinese government officials. So you saw a few
24 moments ago his e-mail with Sun Hui, which was in
25 September 2016. He also spoke regularly or frequently with

1 Hu Ji, the Chinese police officer, in the days leading up to
2 the meeting in October 2016 at the Panera Bread. And again,
3 that was the meeting between Zhu Yong, Hu Ji and Michael
4 McMahon. So you can see here that in the days leading up to
5 that meeting, he was talking frequently to Hu Ji.

6 But Zhu Yong did more than just act as an
7 intermediary and he did more than just hire Michael McMahon.
8 In May 2018, long after Xu Jin had already been located, Zhu
9 Yong conducted additional surveillance. He took photos of Liu
10 Fang's sister's home and he took photos of her vehicle. These
11 are the surveillance photos he took. And then four days after
12 getting those surveillance photos, he returned to China. We
13 know that from his travel records.

14 Zhu Yong knew exactly what was going on. He knew it
15 was the Chinese government who was looking for Xu Jin. He
16 knew that it was the Chinese government officials that he was
17 working for. His very own words confirmed that. He was
18 asked: Mr. Hu and the young man, they were here to do what
19 about in fugitive? He responded: Look for that person.
20 Mr. Hu there is Hu Ji, the Chinese police officer. That's an
21 admission that he knew that Hu Ji was in the United States
22 looking for Xu Jin, the alleged fugitive. And a few minutes
23 later when Zhu Yong was asked: So is Hu Ji part of the
24 police? He responded: I don't know, but he's part of the
25 unit he mentioned before, the overseas, Overseas Chinese

1 Affairs Office. He's part of that.

2 The Overseas Chinese Affairs Office is a Chinese
3 government entity. You heard that from Professor Wedeman.
4 And you can see it here in the party-state system chart that
5 Professor Wedeman used to explain the structure of the Chinese
6 government. It's not a secret that the Overseas Chinese
7 Affairs department is a government entity. And the Overseas
8 Chinese Affairs Office isn't just any government entity, it's
9 one with a known and specific role in Operation FOX HUNT. As
10 Professor Wedeman told you, its role with respect to Operation
11 FOX HUNT is helping the other agencies locate and repatriate
12 individuals to China. Zhu Yong knew that's who Hu Ji was
13 working for.

14 Zhu Yong later admitted again that he knew that the
15 Chinese government was looking for Xu Jin. He said: Police
16 are looking for him.

17 And then Xu Jin -- I'm sorry.

18 And then Zhu Yong described how the Overseas Chinese
19 Affairs Office was only one of the many departments in the
20 Chinese government trying to find Xu Jin. He said: There are
21 several departments looking for him. Whoever finds him first,
22 you know, gets an award. Several departments. All
23 departments are all, like, applied to look for this person.
24 This person is Xu Jin and these departments are the
25 departments in the Chinese government.

1 Let's go back to Professor Wedeman's chart again.
2 You can look at all of the different departments involved in
3 Operation FOX HUNT, ones other than the Overseas Chinese
4 Affairs department: United Front Work Department, Central
5 Committee for Discipline Inspection, the Anticorruption
6 Bureau. Zhu Yong, during his post-arrest interview,
7 essentially outlined the structure of the Chinese government
8 when it comes to Operation FOX HUNT. He knew exactly who he
9 was working for. He knew he was working for the Chinese
10 government. And he knew that when he hired McMahon and when
11 he helped Hu Ji track down Xu Jin.

12 This count is proven with respect to Zhu Yong.
13 Let's turn now to Michael McMahon.

14 The evidence that Michael McMahon knew he was
15 working for the Chinese government and that the goal was to
16 force Xu Jin to return to China is overwhelming. I won't go
17 through all of that, but I will summarize some of the
18 highlights. I'm going to talk about each of these in a little
19 bit more detail.

20 So first, McMahon was given -- McMahon's clients
21 kept changing.

22 So let's start with what he was told when he was
23 hired. The information he was given kept changing without
24 explanation. You can look at the summary chart. On September
25 27, 2017, he was told in an e-mail that the client was a,

1 quote, "lady who had been through a lot." On October 5th,
2 2016, he was told that it was Mr. Jason Zhu; "Mister," not a
3 lady. November 13, 2016; client was referenced as "Eric Yan."
4 April 4, 2016, client was referenced as "Eric's friend from
5 China" or "Johnny," meaning Zhu Feng. Four different supposed
6 clients, at least.

7 That should have been a red flag to anybody and
8 certainly to a private investigator with McMahon's lengthy law
9 enforcement history. Not just a red flag, but it was a lie.
10 And it was a lie that McMahon, again, the better investigator,
11 caught almost immediately because the same day he received an
12 e-mail from the translator saying that Xu Jin was a gentleman
13 who owed a lot of money to Jason Zhu. That was the e-mail we
14 looked at earlier in which Zhu Yong lied. The same day
15 Michael McMahon received that e-mail, he conducted his own
16 search and he learned that Xu Jin was wanted by the Chinese
17 government. We know that. And we know that McMahon
18 immediately understood the significance of that information
19 because he sent it to his friend, Private Investigator
20 Gallowitz. This is an e-mail that McMahon sends to Gallowitz.
21 The subject line: TLO report says wanted by Interpol. The
22 TLO report, you heard, was the database from which you learned
23 that Xu Jin was wanted by Interpol.

24 McMahon also sent himself the China Daily article
25 that you heard a lot about. The title of this article is

1 "Interpol Launches Global Dragnet for 100 Chinese Fugitives."
2 That article included photos and information about both Xu Jin
3 and Lui Fang. That's GX 4018 and GX 4019-B. McMahon sent
4 himself the link in April 2017 with the subject line "China
5 most wanted." But by that point he already knew.

6 McMahon also collected information that was
7 completely irrelevant to collecting a debt, which is
8 supposedly why he had been hired, or even to conducting
9 surveillance. For example, he looked for information about
10 whether Xu Jin and Lui Fang's college-aged daughter was --
11 where she was in college and what her major was. Her major,
12 that's not information needed to collect a debt. That's
13 information collected as part of a harassment campaign.

14 McMahon also improperly accessed and misused
15 information he obtained from the New Jersey Motor Vehicle
16 Commission, which you heard is also referred to as New Jersey
17 CAIR. While conducting the surveillance, McMahon took a photo
18 of a vehicle and he zoomed in on the license plate, as you can
19 see on this exhibit. He believed it belonged to Xu Jin and he
20 then sent it on to Johnny Zhu. Johnny Zhu, you can see in
21 this text exchange, asks him: MC, meaning McMahon, please run
22 info check on plate and the house ASAP. We don't need to
23 monitor their activity until we have some info for those.
24 That's April 6, 2017. McMahon responds "okay." And then he
25 sends information. He sends information about the car being

1 owned, not leased, and who it's owned by, and their home
2 address.

3 To pause on that, that's information that McMahon
4 obtained and then passed along to someone who was working for
5 the Chinese government. That's information that McMahon had
6 access to because he could access the database as a private
7 investigator. But as you heard, he wasn't allowed to access
8 that database for just any reason; he was bound by an
9 agreement which specifically limited how he could use the
10 information he obtained. When McMahon shared the information
11 with Johnny Zhu, he violated that agreement. The purpose for
12 which he shared the information, conducting surveillance and
13 locating an individual for reasons not relating to motor
14 vehicle activity is exactly what he is not allowed to do. You
15 can see that from the language of the agreement itself. It
16 says the information shall be -- that the participant, meaning
17 McMahon, must hold the information in confidence. And it says
18 that he is strictly prohibited from using Commission records
19 to conduct surveillance or to investigate or locate an
20 individual.

21 From the evidence you have heard, you can infer that
22 McMahon improperly obtained the information about Xu Jin and
23 Liu Fang from his buddy, Greg Finning, who at the time was a
24 special agent with the Drug Enforcement Administration or DEA.
25 October 20th, 2016, McMahon spoke with Greg for over

1 40 minutes. You can see that in this phone record. He also
2 sent a text to Greg with sensitive victim information,
3 including social security number, date of birth, New Jersey
4 license plate. That's GX 316 4006-B. And then he followed up
5 with Greg to ask if there was any update. He said: My
6 clients flew in from China and I'm meeting them this eve.

7 DHS records make clear that Homeland Security data
8 such as the information that was provided cannot be shared.
9 This is a warning on the documents in which the information
10 was provided. It says: The information is to be controlled,
11 stored, handled, transmitted, distributed and disposed of in
12 accordance with DHS policy relating to FOUO -- meaning "for
13 official use only," as you can see on the warning itself --
14 information and is not to be released to the public or other
15 personnel who do not have a valid need to know without prior
16 approval of an authorized DHS official.

17 Let's go back and see how we got that information.
18 You heard testimony from HSI Special Agent Neviene Habeeb, who
19 is the individual who pulled the information that McMahon
20 eventually passed along. She told you that she remembered it
21 had something to do with Greg Finning. That was McMahon's
22 friend. And so to be clear, McMahon took U.S. government
23 information which he obtained improperly and he passed it
24 along to an official with the Chinese government.

25 That's not the only evidence reflecting that McMahon

1 knew his actions relating to Xu Jin were illegal. Let's look
2 at the payments he received.

3 Oh, I'm sorry, before I do that, this is the e-mail
4 passing along the information from Special Agent Habeeb, who
5 is the one who told you that her recollection was that the
6 request came from Greg Finning.

7 So, let's look at McMahon's payments in connection
8 with what I'll call "the Xu Jin case."

9 On October 5th, 2016, at the outset of the case,
10 McMahon received \$5,000. That was a retainer fee. You can
11 see there is a note that says: Retainer fee from Jason Zhu,
12 a/k/a Yong Zhu. That's the check we talked about earlier.
13 And that was a check from Zhu Yong, passed along to the
14 interpreter and then sent to McMahon, who then deposited that
15 check into his business account, McMahon Investigative Group
16 account. Again, that was October 5th, 2016.

17 Approximately two months later, on December 13,
18 2016, he received \$5,945. That came by wire transfer from
19 China. He was told to expect that wire transfer by Hu Ji, the
20 Chinese police officer. And the wire transfer itself came
21 from Li Feng, a Chinese prosecutor. Again, it was a wire
22 transfer from China and McMahon knew it was from China. And
23 he knew the description on that wire transfer, "Eric traveling
24 fee," wasn't accurate. And then look at what he did with that
25 wire transfer. He took that almost \$6,000 and he deposited it

1 into his checking account with his wife. He did not deposit
2 it into his business account like he did the first payment.

3 The next payment is April 4th, 2017. That's \$5,000.
4 This time there was a payment made in cash. McMahon got it
5 from Hu Ji and from Johnny Zhu when he met them at the Panera
6 Bread. \$5,000 in cash at a Panera Bread. That's a lot of
7 money to be receiving in cash in a public place or really in
8 any place. No person doing legitimate business is handed a
9 five-thousand-dollar wad of cash in a Panera Bread, it doesn't
10 happen. Oh, I'm sorry, I misspoke. That was Zhu Feng, not Hu
11 Ji for this payment. And we don't know what happened with
12 that cash. We don't know what McMahon did with it, but we do
13 know that it didn't go into the business account.

14 On April 10th, 2017, there is another payment of
15 \$2,000, also from Zhu Feng or Johnny Zhu. This time it was
16 deposited into his son's student checking account. The
17 following day, he gets a payment of another thousand dollars,
18 which again from the same, also from Johnny Zhu, which he
19 again deposits into his son's student checking account.
20 McMahon subsequently, a couple weeks later, transferred that
21 \$3,000 -- so the \$2,000 from April 10, 2017 and the \$1,000
22 from April 11, 2017 -- transferred that \$3,000 total to pay
23 off a credit card with his wife.

24 And then on April 27, 2017, he gets a payment of
25 \$200, this time from Hu Ji, using the name He Sheng, which

1 McMahon deposits into the checking account with his wife.

2 So for this one case, McMahon received payments from
3 four different sources, including two Chinese government
4 officials and two coconspirators, one of whom is the defendant
5 before you. He received the payment in three different
6 formats: Check, wire transfer, cash. And that wire transfer
7 again was from China. And he deposited those payments in at
8 least three different accounts: His business account, his
9 checking account with his wife, and his son's student checking
10 account.

11 And let's look at the timing of what he did and when
12 he did it. It's no coincidence that the only time he
13 deposited the payment from the Xu Jin case into his business
14 account was -- that it was before he learned Xu Jin was
15 wanted. As soon as McMahon learned that Xu Jin was wanted by
16 the Chinese government, he switched to depositing his payments
17 into the other accounts, his joint account with his wife and
18 his son's student account. That's not a matter of
19 convenience. McMahon was deliberately concealing those
20 payments. He was deliberately concealing those sources
21 because he knew the work he was doing was illegal. He knew
22 the payments he was receiving were illegal. He knew the
23 payments were coming from the Chinese government. You can go
24 back and look at those at GX 403-A through L, 436-A, 3072 to
25 '73 and 3075.

1 And that's not even the only way that McMahon's
2 financials demonstrate that he knew he was working for the
3 Chinese government. He earned over \$19,000 from the Xu Jin
4 case. There is -- you can see that at the bottom of this
5 graphic which shows you the different amounts he received and
6 the methods by which he received them. Again, the check, the
7 wire transfer, and the cash, as well as the different sources
8 from which he received this information and the different
9 descriptions.

10 And then you can see from this slide how he treated
11 that money, or I should say more broadly, what he reported on
12 his tax returns. There's a lot of information on this slide,
13 but really what it boils down to is this: If you look at
14 McMahon's business account, the deposits into that account in
15 2016 were more than what he reported on his 2016 tax returns.
16 That's before you even consider the fact that, as we just saw,
17 most of the money he earned on the Xu Jin case never even made
18 its way into the business account. Again, this wasn't
19 oversight. And it wasn't some small amount of money to
20 McMahon. In fact, the money McMahon earned in this case was
21 approximately 20 percent of his total reported earnings in his
22 business account for 2016 and 2017 combined. McMahon didn't
23 report his earnings from the Xu Jin case because he didn't
24 want the U.S. government to know that he had been working for
25 the Chinese government.

1 And for even further proof that McMahon knew exactly
2 what he was doing, we can look at his very own words. In his
3 post-arrest interview, he said: And then the father had flown
4 in from, I think he said, China to convince the son because
5 of -- you know, out of honor for the name. Professor Wedeman
6 explained to you the significance of family honor in Chinese
7 culture. He told you that by approaching the family and by
8 potentially pressuring the family, you are signalling to the
9 individual that they are putting -- they are -- their refusal
10 or lack of return to China is putting the family in danger.
11 McMahon's post-arrest statement reflects that he understood
12 that.

13 So that's been a lot of information about McMahon
14 and what he knew, so let me take a moment to summarize. From
15 the evidence you have seen, you can infer the following:

16 Back on April 3rd, 2017, there was a meeting with Tu
17 Lan and Zhu Feng. That meeting, Tu Lan -- again, the Chinese
18 prosecutor tasked with bringing Xu Jin back to China --
19 specifically said, talking about McMahon: Tell him clearly.
20 I mean, you need to tell him clearly about everything. That's
21 GX 704-A.

22 April 4th, 2017 is the meeting at Panera Bread that
23 you've heard about. You can see from these surveillance
24 photos that the meeting lasted almost an hour. That was the
25 day after the hotel meeting at which Tu Lan instructed that

1 McMahon should be told clearly about everything.

2 And then the following day, April 5th, 2017,
3 Zhu Jin's father arrived in the United States. This is a text
4 message from Zhu Feng to McMahon saying: I just got the
5 package. That's a reference to Xu Jin's father. It's a coded
6 word in a text exchange that McMahon never questioned or
7 sought to clarify because he didn't need to; he had already
8 been told exactly what that meant. That's GX 4010.

9 After his arrest, McMahon said: I think he had
10 mentioned to me that they were trying to get him to come back
11 to China. The "him" there is Xu Jin. And then McMahon said:
12 So they could prosecute him. In other words, Tu Lan said that
13 Zhu Feng should tell McMahon everything. And the evidence
14 demonstrates that's exactly what they did. They told McMahon
15 everything. They told him exactly who he was working for:
16 The Chinese government. And they told him why he had been
17 hired: To help force Xu Jin to return to China. McMahon's
18 own words support that.

19 Count Two is proven.

20 Let's talk now about Congying Zheng. There's an
21 additional instruction that I expect Judge Chen will provide
22 that is particularly relevant to your consideration of the
23 evidence against Congying Zheng: Conscious avoidance. As you
24 will learn from Judge Chen, conscious avoidance means
25 purposefully closing your eyes so that you don't see

1 something. If Zheng was asked any questions or used his
2 common sense, it would have been obvious to him that he was
3 acting as an agent of the Chinese government. Nothing happens
4 in a vacuum.

5 When Zheng Congying receives -- I'm sorry. When
6 Congying Zheng received his marching orders to threaten Xu Jin
7 at his home, he did it against the backdrop of Operation FOX
8 HUNT, which you've heard a lot about. Operation FOX HUNT was
9 highly publicized both on Chinese media and U.S. media during
10 the relevant time period. You heard Vincent Kuang tell you
11 exactly that: "Do you know if Zheng used the Chinese TikTok
12 you were just discussing?" "Yes."

13 As I described earlier, there's no real question
14 that Zheng went to Xu Jin's and Liu Fang's home to intimidate
15 them. He invaded their private property. He banged on their
16 door. He tried to open the front door to go inside. He went
17 on to the back of the house. He peered inside the house. And
18 then he left three notes, all with the exact same message, to
19 be sure that that terrifying message wouldn't be missed. You
20 saw and you heard a lot of evidence making absolutely clear
21 that's what happened. These images you're looking at of Zheng
22 doing exactly that are GX 709-A and GX 108.

23 You also heard testimony that Zheng was aware that
24 others had been to the same home, Xu Jin and Liu Fang's home.
25 That's further evidence that Zheng knew he was part of a

Summation - Ms. Arfa

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1 larger effort to intimidate and harass the victims. There was
2 testimony by Vincent Kuang, who told you that.

3 Kuang also told you that they went back to the home
4 because they were trying to figure out if anybody was inside
5 the home but deliberately not coming out: So after we left,
6 he wanted to see if someone had moved that note. That's the
7 explanation for why, after they posted the note, they left and
8 then came back. They wanted to see if anyone had taken it
9 down. They wanted to see if anyone was there.

10 And the words of the note make absolutely clear who
11 Congying Zheng was working for when he went to Xu Jin and Liu
12 Fang's home that day. Let's look at the note: If you are
13 willing to go back to the mainland and spend 10 years in
14 prison, your wife and children will be safe.

15
16 (Continued on the next page.)
17
18
19
20
21
22
23
24
25

1 (Continuing.)

2 MS. ARFA: It was the Chinese Government that wanted
3 Xu Jin to turn him in, it was the Chinese Government that
4 wanted Xu Jin to spend 10 years in prison. Private citizens
5 don't put people in prison. Vincent Kuang told you how
6 obvious that is. He was asked, who runs prisons in China.
7 The answer was, The Government.

8 Count Two is proven with respect to Congying Zheng.
9 We've walked you through all of the evidence that each
10 defendant was guilty of acting as an agent of the Chinese
11 Government without prior notification to the attorney general.
12 Each defendant is also guilty of conspiracy because they
13 agreed, with others, to work toward that same illegal goal, to
14 harass and intimidate Xu Jin and Liu Fang in order to
15 repatriate them to China against their will. We've proven
16 this Count Two.

17 Ladies and gentlemen, at the start of this trial,
18 the Government stood before you and told you that we would
19 prove these charges beyond a reasonable doubt. That is
20 exactly what we've done. The evidence has shown that
21 Defendant Zhu Yong acted as a conduit for the Chinese
22 Government here in the United States. The evidence has shown
23 that he repeatedly met with an official of the Chinese
24 Government, a policeman, Hu Ji, tasked with bringing Xu Jin
25 and Liu Fang back to China. The evidence has shown that

1 Zhu Yong hired a private investigator to locate and surveil
2 the victims. The evidence has shown that the private
3 investigator that Zhu Yong hired was Defendant Michael
4 McMahon, and the evidence has shown that months later,
5 Zhu Yong conducted further surveillance, even after Xu Jin's
6 home, residence, had been located and identified, and that
7 Zhu Yong conducted that additional surveillance for days
8 before he returned to China.

9 The evidence has shown that Defendant Zhu Yong knew
10 exactly who he was working for and what the goal was. The
11 evidence has shown that Defendant Michael McMahon surveilled
12 the victims. The evidence has shown that even after he
13 obtained Xu Jin's address, McMahon continued to obtain and
14 share detailed personal information about the victims and
15 their family members. The evidence has shown that McMahon had
16 no legitimate reason to obtain or share that information. The
17 evidence has shown that his true purpose was to help the
18 Chinese Government to harass and stalk the victims. And the
19 evidence has shown that McMahon knew that Xu Jin and Liu Fang
20 were wanted by the Chinese Government.

21 The evidence has shown that Michael McMahon knew
22 exactly who he was working for and what the goal was. The
23 evidence has shown that Defendant Congying Zheng went to
24 Xu Jin and Liu Fang's home to try to find them and to leave
25 the threatening notes on their door. The evidence has shown

1 that Zheng invaded their property and shattered their feelings
2 of safety, banging on their door, trying to get inside, and
3 then going around back to peer inside. The evidence has shown
4 that Zheng, in fact, left the threatening notes on the front
5 door, and the evidence has shown that the notes threatened
6 that Xu Jin's wife and daughter would be safe only if he
7 returned to China and spent 10 years in prison there. The
8 evidence has shown that Congying Zheng knew exactly who he was
9 working for and what the goal was.

10 We ask that you enter the only verdict consistent
11 with the evidence, with the law, and with your common sense.
12 We ask that you enter a verdict of guilty on all counts for
13 each of the defendants.

14 Thank you.

15 THE COURT: Thank you, Ms. Arfa.

16 Ladies and gentlemen of the jury, we'll take our
17 morning break now. So please be ready to go again at 10 of
18 noon, and still do not talk about the case, do not do any
19 research, keep an open mind.

20 We'll see you at 10 -- did I say 10 of 2:00 -- 10 of
21 12:00. Sorry.

22 THE COURTROOM DEPUTY: All rise.

23 (Jury exits the courtroom.)

24 THE COURT: All right, everyone. You have 15
25 minutes. And obviously, Mr. Lusterberg, you should set up.

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1 Off the record for one second.

2 (Off the record.)

3 (A recess was taken.)

4 THE COURT: My apologies, everybody. Let's get
5 started.

6 Mr. Lusterberg, are you ready?

7 MR. LUSTERBERG: Yes, Your Honor.

8 THE COURT: Have a seat, everyone.

9 Just off the record for a second.

10 (Off the record.)

11 THE COURTROOM DEPUTY: All rise.

12 (Jury enters the courtroom.)

13 THE COURT: Please be seated, everyone.

14 Mr. Lusterberg.

15 MR. LUSTERBERG: Thank you, Your Honor.

16 THE COURT: Mr. Lusterberg, before you begin, I just
17 want to advise the jury that we are going to take our normal
18 lunch break at 1:00, and I've advised Mr. Lusterberg of that.
19 It may be that he will have to begin now before the lunch
20 break, but continue afterwards.

21 Go ahead, Mr. Lusterberg.

22 MR. LUSTERBERG: Thank you very much, Your Honor.

23 Good morning, ladies and gentlemen of the jury.

24 THE JURY: Good morning (unanimously).

25 MR. LUSTERBERG: And really glad to be addressing

1 you again, although, I'm in kind of a difficult spot here.
2 Psychologists say that what people remember and process most
3 is they call it the primacy recency phenomenon, what they hear
4 first, and what they hear last. Well, I'm neither first nor
5 last. You heard Ms. Arfa at some length, Mr. Heeren is going
6 to go at the end, and in between, you'll hear my colleagues,
7 Mr. Goldberger and Mr. Tung. So I have to really ask you to
8 do the best that you can, and I know that you will, to focus
9 on what I say, to try to remember it, and to consider it when
10 it comes time for you to do your deliberations. I know you'll
11 do that.

12 But I know it's also difficult, and all I can do is
13 really plead for you, because I'm in this difficult position
14 with my client, Mike McMahon's very life on the line. So I
15 just have to plead with you to just do the best you can to
16 think of all of what I'm going to say, to consider all of it
17 as you deliberate.

18 When I stood up at the beginning of this case, I
19 told you that a lot of the facts of the case with regard to
20 Mike McMahon would be undisputed, and really, that's turned
21 out to be true. Let's start here: We have never denied,
22 never for one second, that Mr. McMahon was hired to be a
23 private investigator, which, by the way, you've heard is a
24 legitimate profession, you've heard from other private
25 investigators, you've heard from the New Jersey Motor Vehicle

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1 Commission saying they provide records to private
2 investigators, and that he was hired to be a private
3 investigator for an investigation that involved Mr. Zhu --
4 Xu Jin.

5 There's also no doubt as to how he got hired. That
6 story has been told here. Yong Zhu sought to hire someone to
7 assist him to collect a debt, he went to a Chinese-speaking
8 attorney, Liping Shi, Ms. Shi, who you heard from, looking to
9 find a private investigator who was licensed in New Jersey.
10 Ms. Shi, in turn, reached out to an attorney that she knew
11 from the Kings County courthouse, I think she said, where she
12 did a little bit of criminal work. She was mainly an
13 immigration lawyer. That attorney, in turn, contacted Paul
14 Brickfield, from whom you've heard, a former and a criminal
15 defense attorney in New Jersey asking for a recommendation as
16 to an investigator.

17 Paul recommended Mike McMahon, a former NYC cop and
18 a private investigator who lived and worked in New Jersey.
19 Mike got to work. Let's be clear about this, not because he
20 had some kind of history for working for the Chinese
21 Government or because he was some sort of great candidate to
22 break the law. He got the work because he was an investigator
23 in New Jersey to whom the case was referred. He did a normal
24 written retainer agreement which we'll show you, and was shown
25 to you earlier. There it is, Exhibit 3009. I know that's a

1 little bit small, but you'll have a chance to look at that in
2 the jury room. And he was paid as you heard, by check.

3 If we could just call up that check for a sec.

4 And I'd like you to take a good look at that check.
5 Because the check says -- it's because Jason Zhu, Yong Zhu,
6 and Li Hongzhong. You haven't heard anything about
7 Li Hongzhong, but the Government has sort of made a big deal
8 about the fact that these are these shifting clients, and one
9 of them was a woman.

10 Any event, having been properly retained, he now,
11 seven years later, finds himself in front of you, members of
12 the jury, accused of four federal offenses. It's almost
13 really unimaginable.

14 It's also very little doubt, actually, as to what
15 Mr. McMahon did. He performed surveillance on five days, five
16 days, over six months apart. One date in October of 2016.
17 That was October 6th, 2016. And sorry, when I refer to notes,
18 there's, like, a lot of facts, so I want to make sure I get
19 them right. And four days in 2017; April 5th, April 6th,
20 April 10th, and April 11th, at both Xu Jin's sister-in-law's
21 home in Short Hills, New Jersey, and at his own home in
22 Warren, New Jersey. So that, ladies and gentlemen, is what
23 this case is about, five days in the life which the Government
24 has pulled apart, dissected, and searched for reasons to
25 condemn. I'll come back to that.

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1 But the surveillance, exactly what private
2 investigators do every day, while we never disputed it, was
3 actually proven to all of you at great lengths by the
4 Government, by gathering Mr. McMahon's business records, by
5 reenacting text chains. You've heard witness after witness
6 who, I'll read the left you read the right, I'll read the
7 green, you read the blue. This is something you heard over
8 and over.

9 THE COURT: Mr. Lusterberg, just remember go a
10 little slower.

11 Go ahead.

12 MR. LUSTERBERG: Sorry. This is how we talk from
13 New Jersey.

14 And even doing complicated cell site analysis. So
15 all this was shown to show surveillance that we never really
16 denied.

17 The facts were that Mike, like many other private
18 investigators, did surveillance. There's also no doubt that
19 he obtained records, records that were particularly focused on
20 understanding Mr. Zhu's assets. Indeed, from the outset, he
21 was focused on tracking money which makes sense, if you were
22 trying to help collect a debt.

23 I want to show you a couple of exhibits about that.
24 So Exhibit 3026.

25 And here, if you take a look it -- I don't know if

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1 you can see it. I don't know if Ms. Conti can blow up that
2 one little sentence more. Where would I be without her?

3 Any way, what that sentence says is, He wanted to
4 know if you can get any Xu Jin and his wife Fang Liu's records
5 of latest purchases through their Social Security number and
6 driver's license.

7 Let's look, as well, at Exhibit 3056 at Page 3.
8 Again, I'm sorry for the small print. I know it's hard to
9 see.

10 And what it says is, Sorry for misunderstanding of
11 offshore. From the financial record of our company -- and I
12 should note, this is an e-mail from Eric Yan. I'll come back
13 to Mr. Yan in a minute.

14 Sorry for misunderstanding of offshore. From the
15 financial record of our company, Zhu transferred the money to
16 those eight accounts, so we need check these accounts first.
17 Several accounts are from United States.

18 Why am I telling you this? I'm telling you this to
19 show that what Mr. McMahon was investigating was the assets of
20 someone who he had been told was -- had embezzled money and he
21 was trying to recover that money.

22 There isn't any question, though, and we have never
23 denied either, that Jin Zhu was wanted in China, or even that
24 those who hired Mike were Chinese officials who were involved
25 in an operation to repatriate him. That's not something that

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1 we've disputed. There is -- I'll come back to that.

2 But there's not even any real doubt that he met some
3 of those people, and the Government, you saw, a lot of video
4 at Panera Bread and so forth, at Panera Bread twice, and once,
5 you saw some reference to meeting at a lawyer's office. Much
6 ado, in fact, has been made of the picture of Mike at Panera
7 Bread -- let's just remind you of that picture, Exhibit 902F,
8 you saw it again today -- as if it were really some evidence
9 of criminality. I want to think about that picture as you
10 deliberate, that this, the Government says, is evidence of a
11 crime, a man standing in a public place at Panera Bread with
12 two other people. Mike has never denied that meeting took
13 place any more than the Government has never denied that Mike
14 had no intersection whatsoever with many of the people that
15 you saw on the chart earlier. People like Tu Lan, Xiao Jun,
16 Sun Hui, Li Minjun, Li Feng. Those are names that you heard
17 over and over, and you saw them on the chart in front of you
18 for most of this trial. There is no contention by the
19 Government and it is undisputed that Mike McMahon never
20 interacted, never met, never talked to, never corresponded
21 with, with one exception I'll get to in a second, any of them.
22 And the one exception is Li Feng, which I'll come to.

23 Also, you saw from the cell site data that he was
24 never where near the Embassy Suites near Newark Airport where
25 there was a meeting that you heard a lot about, and we'll come

1 back to that, where this whole surveillance operation was
2 discussed. All of those sorts of things here, ladies and
3 gentlemen, are really undisputed. You don't have difficult
4 fact-findings to find about who Mike McMahon was and what he
5 was doing.

6 What is disputed, and it's important to listen to
7 what everybody says and remember that this is what's disputed,
8 is Mike's understanding that in doing the work he was, he was
9 working, not for China, but for a company seeking to recover
10 the proceeds of an embezzlement which is what he understood.
11 The -- it was not -- the evidence, you know, what's disputed,
12 is whether he was involved in a -- not in an effort to get
13 Mr. Zhu to return to China, but whether he was trying to do
14 that on behalf of the Chinese Government. And Ms. Arfa has
15 argued that he was, and I'm going to show you why he wasn't.

16 Let me start here: There is not one, as I told you,
17 there would not be, not one spec of evidence of direct
18 evidence that Mike McMahon knew he was working for China.
19 Now, you've heard a lot about circumstantial evidence, about
20 putting money in his son's account, about taxes, about getting
21 records, but think to yourself, isn't it true what I told you
22 in openings that there was not one piece of evidence, not one
23 e-mail, where Mike is told that he's working for China or
24 reflects that he understands he's working for China, not one
25 text message, where he says, I know I'm working for China or

1 someone informs him that he's working for China, not one
2 witness who reports a conversation, not one who reports
3 saying, I spoke to Mike McMahon and I told him he was working
4 for China. Not one witness sat on that witness stand and said
5 something like that to you. Not one statement by Mike McMahon
6 that said I know I'm working for China. Not one. That lack
7 of evidence alone creates reasonable doubt as to whether Mike
8 knew that he was working for China.

9 But leave aside for the moment what the Government
10 didn't prove, though there was lots of that. You saw over and
11 over, over and over, that there was no evidence of the
12 conversations that Mike was having with people. I want really
13 to focus on this just for a moment, if I can. Ms. Arfa argued
14 to you a few minutes ago that there were meetings that
15 Mr. McMahon had where he talked with people about working for
16 China. But think to yourself whether you heard anything about
17 that. The answer is no. In fact, what you heard over and
18 over was that the Government didn't know what occurred in all
19 the conversations that took place between Mr. McMahon and
20 others.

21 Let me just remind you of one Exhibit first. So
22 remember Exhibit 316 -- and you could look, as well, at
23 Government Exhibit 317. These are -- these reflect calls that
24 were made between Mr. McMahon and other people, and on
25 cross-examination, we asked the agent, I think it was, who was

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1 presenting this information, do you have any information about
2 what was said in those calls, anything at all, and the answer,
3 of course, was no. And when the expert, Ms. Wheeler, Agent
4 Wheeler, on cell site data came up, she talked about a lot of
5 calls too. And Ms. Conti, questioned her, do you know, do you
6 have any information about what the content of those calls
7 was, and the answer to that was no. Because we don't know
8 what those calls was. There was no one witness who came
9 forward and said what was said to Mr. McMahon or by
10 Mr. McMahon on those calls.

11 But it's more than that. Remember the second
12 meeting in April of 2017 at Panera Bread. That was a meeting
13 between Mr. McMahon and Johnny Zhu between coming and going in
14 the Panera Bread, Ms. Arfa is right, it's about an hour. But
15 what was said during that hour? No one knows. No one can
16 know. Johnny Zhu was present for that meeting with
17 Mr. McMahon, wasn't here to testify. We'll come back to that.

18 And the other person who was present at that meeting
19 Hongru Jin specifically testified, and you heard him, he said
20 he sat off to the side and couldn't hear a word of the
21 conversation. So Ms. Arfa says to you today that they must
22 have talked, in essence, about China, because this occurred a
23 day after a meeting -- which we'll come back to -- at the
24 Embassy Suites, in which Tu Lan directed Johnny Zhu to tell
25 everything to Mr. McMahon -- but we'll come back to that --

1 and because it was an hour, basically. So -- oh, and she also
2 says that there was an e-mail later that used the word package
3 which she said was code for something. But that you heard no
4 evidence about package being a code for everything. Nobody
5 testified to you about that. And I'm going to, again, beseech
6 you, just consider the actual evidence, not stuff that's made
7 up, based upon the evidence.

8 Any way, let's talk a little bit -- and let me say
9 one other thing about that. Our whole system turns on your
10 considering -- and Judge Chen will instruct you as to the law,
11 and I'll say the same thing as Ms. Arfa did, anything I say
12 about it that's inconsistent with what she says, she wins --
13 you have to consider the evidence. The whole system is built
14 on considering what was actually introduced, not what the
15 Government thinks was introduced.

16 But let me show you some things that were
17 introduced. Texts and e-mails in which from the very
18 beginning, Mike McMahon was told over and over and, in no
19 uncertain terms, that he was trying to find a McMahon who had
20 stolen money. Remember -- let's start here -- this e-mail in
21 response to Mike's effort to understand what was going on. So
22 first, Mr. McMahon asks some questions. The Government says
23 Mr. McMahon asked no questions. He asked some questions about
24 what the Investigation was about. That's Exhibit 1022. And
25 the response from the translator at the time -- and Ms. Arfa

SUMMATION - MR. LUSTERBERG

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1 showed you this as well, that's still 1022 -- says, Sorry
2 Mike, I forgot to indicate Jin Xu's gender. Jin Xu is a
3 gentleman who owned -- owed -- a lot of money for
4 Mr. Jason Zhu. Instead of repaying the money he owned, Mr. Xu
5 chose to run away and that's why Mr. Zhu needs to find out
6 where does Jin Xu live and other relate information. Mr. Zhu
7 said there's no attorneys involved -- answering one of the
8 questions that Mr. McMahon had asked.

9 Gives you a sense of what he was looking at. But
10 let's talk about this in a little more detail, because you
11 heard a lot more than that. And I'd ask you to remember all
12 of those texts that were read to you in which over and over,
13 Mike was told, in no uncertain terms, by Zhu Feng -- that's
14 Johnny Zhu -- that he was working for a company, for a
15 company. There are a lot of these, and you'll have all of
16 them in front of you. But I'm going to remind you of the
17 evidence by showing you just a few.

18 So let's look first at exhibit -- Government
19 Exhibit 805B at Page 13. So this is text exchange between
20 Mr. McMahon and Johnny Zhu in which Johnny Zhu says, okay, MC,
21 I spoke with my company last night, they want you to monitor
22 on Monday, but with one person. Meaning, one other
23 investigator with him. Or just him. I haven't get reply from
24 invoice yet. I think they are okay with it. Can you start on
25 Monday first and I will come to your office by Tuesday.

SUMMATION - MR. LUSTERBERG

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1 Then, a little bit later, exhibit -- Government
2 Exhibit 805B at 15, the text says, from Johnny Zhu, the
3 company wants the property list which belong J Lifetime. Can
4 you do that? We'll come back a little bit later to
5 J Lifetime. But you can see that Mr. McMahon is being told
6 that this is an inquiry on behalf of a company. A little bit
7 later, 805B at 19. In response to a discussion about whether
8 to undertake bank checks to check on bank accounts to try to
9 track down Xu Jin's assets, Johnny Zhu tells him, quote,
10 Standby, I will inform your suggestion to the company tonight.
11 Again, 805B, Government Exhibit 805B at Page 21, Johnny says,
12 I will stay here as long as the company requires. And at Page
13 26, Johnny says, I will speak with the company tonight.

14
15 (Continued on the following page.)
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25

1 (Continuing.)

2 MR. LUSTBERG: Just one more with Johnny.
3 Government Exhibit 805-B, page 28: MC I will deposit 1K to
4 your account tmr morning; tomorrow morning. Company want to
5 switch to lightweight surveillance with one person tomorrow
6 until further notice. They are discussing how we gonna handle
7 this, this week. We will send one agent until they tell us
8 what to do.

9 And it's not just that Johnny keeps referring to who
10 he's working for not as China, but as a company. It's also --
11 let's look at Mike's responses.

12 So Government Exhibit 805-B, at page 14: So your
13 company only wants one investigator for Monday?

14 The company; Mike thinks he's working for a company.

15 In Government Exhibit 805-B again, at page 24, Mike
16 asks: How did the company in China find you and Eric to work
17 in this case?

18 Let me use this as a way of transitioning to Eric.

19 Eric Yan is -- you know that's not his real name,
20 the Government has told you that. That was an alias. It was
21 an alias that was used by a government official in China, Hu
22 Ji, H-U J-I, to disguise his identity. To who? To Michael
23 McMahon. Mike was never told that Eric Yan was an alias for
24 Hu Ji. He was never shown that nice chart with all those
25 pictures and explained who all of those people were and who

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2004

1 they work for and what their role in the Chinese Government
2 was. That was not stuff that Mike was told.

3 What Mike was told that was there was -- he was
4 working for a company. And he was told it over and over. He
5 acknowledged it over and over. And he was told that by
6 somebody named Eric Yan, which was a fake name; an alias.
7 I'll come back to that. I know I keep saying I'll come back
8 to that. I will, I will.

9 So Eric also, in his communications with Mike,
10 references a company.

11 Let's look at Government Exhibit 3047 in evidence.

12 This is an email between Eric Yan and Mike, in which
13 Eric says: I have already back to China and reported all we
14 found to my boss of the company. And then he later says: So
15 we are willing to commission you to start the offshore
16 property investigation and also the investigation of these
17 eight account.

18 Then, and this is important, Exhibit 3056, this was
19 on December 4, 2016. This is an email from Eric Yan, the
20 alias, to Mike, which says: Hi, Mike. Our finance manager
21 wire you the money this morning. It will take three to five
22 working days to get to your account.

23 This is important because, if we look -- we looked
24 earlier at the exhibit that said: Sorry for the
25 misunderstanding. From the financial record of our company,

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1 Zhu transferred the money to those eight account, so we need
2 to check those accounts first.

3 So this is part of that same inquiry into Mr. Zhu's
4 assets.

5 But approximately three to five working days later,
6 and this is Government Exhibit 403-A that you have there,
7 Mr. McMahon gets a wire transfer from Li Feng. Now, you know,
8 but there's no evidence that Mr. McMahon knew that Li Feng was
9 also a government official in China. What he understood,
10 would have understood, reasonably you can infer based upon
11 these emails, is that Li Feng was the finance manager who had
12 been referred to as wiring him money that would take three to
13 five days to clear, and that's exactly what happened.

14 Let's step back from all of this, and let me ask you
15 to just really use your common sense. If Mike McMahon was in
16 this conspiracy, if he had reached an agreement with these
17 people to act on behalf of China, why would they be leading
18 him to believe that he was working for a company? You know
19 the answer; you do. Because you heard the testimony of Hongru
20 Jin who last week told you, after having listened to a
21 tape-recording of a meeting between him and Tu Lan and Johnny
22 Zhu, a meeting at the Embassy Suites, to which Mike McMahon
23 was not invited and certainly was not present, as the cell
24 site data showed, and this is what -- on pages 1088 and 1089
25 of the transcript, and I didn't put it up, but let me remind

1 you -- oh, we did put it up. Ms. Conti is unbelievable.

2 So here's what Hongru Jin said about that: After I
3 listened to the audio, I thought that when Johnny Zhu
4 mentioned Mike Mike, it was because earlier Tu Lan said, no
5 matter how Mike was like, it would be best for him to fill the
6 instruction and do so. So Johnny Zhu said, maybe Mike will
7 not do it as instructed. That's my thought.

8 So I asked: So your thought was, what you
9 understood was that there was a concern that Mike would not do
10 what -- he would not follow that direction; is that correct?

11 Yes.

12 Okay. And a little bit later, Tu Lan says this: He
13 is an American. I don't have any control.

14 I actually misread that. I should have read: I
15 don't have much control.

16 Do you remember, I asked Hongru Jin, Tu Lan saying
17 that?

18 He said: Yes.

19 And I said: And what did you understand Tu Lan to
20 mean when she said that?

21 ANSWER: It would be the literal meaning, as in the
22 private detector is going to arrive then, he could not be
23 controlled or he cannot be ordered.

24 I'm going to ask you to look -- I didn't, in fact,
25 pull this up -- at the whole transcript of that meeting that's

1 in evidence, and I'm going to ask you to remember where
2 Ms. Arfa cut it off when she summed up to you a little while
3 ago. She cut it off at the point at which it said: You need
4 to tell Mike everything.

5 I'm going to come back to that.

6 But that was right before what Tu Lan says: He's
7 American, so therefore, I don't have much control.

8 Remember that, because that goes to the fundamental
9 nature of this relationship.

10 But there's more. In testimony that was not
11 elicited by me, but in response to questions from the
12 Government, I asked these questions to Hongru Jin about the
13 surveillance he was doing, and here's what that exchange was:

14 Do you recall one of defense counsel asking you
15 about when Zhu Feng yelled at you for being seen by the
16 private investigator?

17 I remember.

18 Let me interrupt myself there and remind you what
19 this was about. There was surveillance going on, and Hongru
20 Jin testified that during that surveillance he had encountered
21 the private investigator or somebody else, and he said -- and
22 the Government asked:

23 And was the issue that during your surveillance,
24 that another person doing surveillance saw you?

25 ANSWER: Yes.

1 Was the issue also that another person -- well, was
2 there anyone else that they didn't want you to be seen by?

3 ANSWER: Yes.

4 Who else did they not want you to be seen by?

5 ANSWER: It should be the private detective.

6 Why is this so important? It shows that the Chinese
7 Government officials, who are in charge of this whole
8 operation, in an unguarded moment on tape, first, showed that
9 they didn't trust Mike, that they couldn't control him. And
10 you heard that they trusted him so little that they did their
11 own surveillance. You've learned about that other
12 surveillance they were doing. Mike had been hired to do
13 surveillance, but meanwhile, they were doing their own
14 surveillance. And, of course, as you heard yesterday in the
15 discussion with Mr. Gallowitz, Mr. McMahon didn't trust them
16 either. So, some conspiracy.

17 I just want to go back for one more second to that
18 conversation in the hotel. Tu Lan says, and I quote: Because
19 he is an American, I don't have much control.

20 But she also says: Tell Johnny Zhu, tell him
21 clearly -- and Ms. Arfa summed up on this -- I mean, you need
22 to tell him clearly about everything.

23 But I asked Hongru Jin: Do you know whether Mike
24 McMahon was, quote/unquote, told everything? Do you know, I
25 asked him, what Johnny Zhu said to the private investigator?

1 To which Hongru Jin, who was present for the meeting
2 the next day at the Panera Bread, said: Sorry, I don't know.

3 And I said: Okay. Because you never spoke to
4 Johnny Zhu about what he said to the private investigator; is
5 that correct?

6 He said: Yes. It was because when Johnny Zhu was
7 talking to the private investigator, at the time I was staying
8 at another table, there was some distance, so I don't know
9 what was discussed.

10 Hongru Jin, the witness that they put up there to
11 make this case about what Mr. McMahon knew, didn't hear
12 anything. And Johnny Zhu, as you saw on the videotape, was
13 permitted to get on a plane and go back to China.

14 Mike McMahon was not trusted by the Chinese. And
15 let me be clear: Among the things I don't dispute is that
16 those people, Tu Lan, Hu Ji, that they're Chinese Government
17 officials. I mean, I don't know, but I think the Government
18 showed that to you. But Mike was not part of that inner
19 circle, that inner circle that planned this operation, that
20 sat in a room at the Embassy Suites Hotel. And why? If he
21 was really part of the conspiracy, don't you think they would
22 have invited him into that? But they didn't, because they
23 didn't want him to know what they were doing.

24 And let's think about some of the other evidence you
25 heard that goes to that. Hongru Jin, who was present for that

1 meeting and was part of this whole kind of inner circle in a
2 way, he got specific direction about what to do in case he was
3 caught. Remember that? He was told, in case you're caught,
4 tell a story, say that you're a tour guide. That was -- he
5 got advice on what to do if he ever got caught.

6 By the way, if you remember the videotape of Johnny
7 Zhu, Johnny obviously told the same story.

8 Mike McMahon wasn't given any kind of story to tell.
9 There's no evidence of that. There's no emails about that,
10 there's no texts about that. In fact, what you know, based
11 upon what we've just talked about and what you've seen by way
12 of evidence, is that the Chinese lied to Mike McMahon. They
13 lied to him about what he was investigating, they lied to him
14 about who he was. And you know that they're perfectly capable
15 of that because you saw, and Ms. Arfa described it well, the
16 videotape that was played to you, I think on Monday, where
17 it's horribly manipulative, you know, emotionally twisted
18 videotape trying to get the family to return to China.
19 They're capable of that kind of deceit. And that family is a
20 victim of Chinese misconduct.

21 But ladies and gentlemen, so is Mike McMahon. May
22 be, you know, a cop for a while, he shouldn't have been, but
23 should and shouldn't is not what this case is about. This is
24 not a negligence case. It's a case about whether he had
25 criminal intent. It's a case about whether he knew he was

1 working for China.

2 Later on today, or whenever we get to instructions,
3 hopefully today, Judge Chen will instruct you to find a
4 defendant guilty of this offense; that is, the offense set
5 forth in Count Two and it's the conspiracy in Count One, you
6 must find that the defendant knew that he was acting as an
7 agent of the Government or an official of China. Not should
8 have known; that he knew.

9 Mike McMahon didn't know, because he was deceived
10 from the outset. He was lied to. Ladies and gentlemen, he,
11 too, is a victim of this offense. That, respectfully, is what
12 the evidence shows.

13 Anyway, the prosecutors sort of have to acknowledge
14 that there's no direct evidence, that there's no conversation
15 in which Mike acknowledges that he was working for China, that
16 there's no witness who says I told Mike he was working for
17 China. There's no emails or texts or conversations along
18 those lines that says that he was working for the People's
19 Republic of China.

20 So they have to focus on the circumstantial
21 evidence. And I'm going to talk about their circumstantial
22 evidence that you heard about this morning in a moment. And
23 Judge Chen will also instruct you as to circumstantial
24 evidence. And she'll tell you that you can consider
25 circumstantial evidence just as you would direct evidence.

1 I'm not trying to demean it. It is like -- I think I talked
2 about this in my opening, as well. We're all here in this
3 room with no windows, if somebody just walked in, and maybe
4 this can even happen later today, we actually need the rain,
5 if somebody walked in with a wet umbrella, you could infer
6 that it was raining outside. That's is circumstantial
7 evidence. Even though there's no direct evidence, you didn't
8 see the rain, you didn't see the rain hitting that umbrella,
9 you could infer that. That's what circumstantial evidence is,
10 and that evidence can be used by you in deciding guilt or
11 innocence in this case.

12 Judge Chen will tell you that you should do that
13 based upon reason, experience, and common sense to infer the
14 existence or nonexistence of a fact from other established
15 facts. And again, she'll put it in the right words. I'm just
16 kind of summarizing for you here.

17 But here, those established facts lead, like night
18 from day, inexorably, to the conclusion that Mike did not know
19 that he was working as some sort of secret agent for the
20 People's Republic of China.

21 So here's the circumstantial evidence to which I
22 would point and I would ask you all to consider.

23 First, if Mike knew that he was illegally working
24 for the People's Republic of China, that is, if he knew that
25 he was breaking the law as opposed to making a terrible

1 mistake in agreeing to take this work in the first place,
2 would he have met with government officials in highly public
3 places, with surveillance cameras, like Panera Bread in
4 Paramus, New Jersey on two occasions or like a lawyer's
5 office?

6 Just to remind you, let's take a quick look at one
7 of the pictures at Panera Bread. This is Government
8 Exhibit 103-A.

9 And look at all those people. And there's Johnny
10 Zhu, who is identified. And this is the place where this
11 secret is being all discussed by people speaking in English.

12 So is that the kind of thing that people who are
13 involved in some kind of secret campaign do? That's
14 circumstantial evidence, that Mike McMahon did not know he was
15 working for the Chinese. If he knew that he was doing
16 something wrong, if he knew that he was working for the
17 Chinese, would he have involved so many other people? You've
18 seen, you know, the evidence of the calls and the texts that
19 show that he worked with people and, in fact, he subcontracted
20 with two other former NYC cops, Eric Gallowitz, who testified,
21 and Mike Kelly, to help him with his surveillance and in his
22 work to obtain records. These are people with whom he shared
23 critical facts about the case, including the China article
24 about how Mr. Zhu was wanted in China for embezzlement and
25 corruption.

1 If you're doing something wrong, are you going to
2 hire other people who are former law enforcement to work with
3 you to do that? Maybe most powerfully, would he have told the
4 police -- this is not something that came up in the
5 Government's summation -- exactly what he was up to? The
6 evidence before you will show that when Mike McMahon went and
7 did surveillance in the towns of Short Hills and Warren, he
8 informed the local police of that.

9 Let me show you the evidence of some of that, at
10 least. This is Exhibit 407, which is a police report from
11 Millburn, which is where Short Hills is, for those of you who
12 don't know New Jersey. And among the things it says is, it
13 discloses that the investigators who are there, are there, and
14 that they're carrying; that is, that they have a gun. You
15 heard some evidence that they were carrying weapons. Beyond
16 that -- and you'll see reports -- I'm not going to put it up
17 right now, but there's also Exhibit 410, which is a similar
18 police report for Warren.

19 So Mike McMahon goes to these places, and he reports
20 to the police that he's doing surveillance. Is that something
21 he would do if he thought he was illegally working for the
22 Chinese? Just ask yourself as you think about this evidence.
23 And I want to make sure that you understand exactly how hard
24 he worked to tell them.

25 So there's a stipulation that's in the record

1 regarding the phone numbers of the two police departments.
2 And Exhibit 314, which is Mike's phone records, shows his
3 calls on pages 191, 237, 236 -- I'm sorry, 236, 237, and 238,
4 Mike's phone calls to those police departments.

5 And you also know that that's what he was up to
6 because in the text message exchanges between Mike McMahon and
7 Eric Gallowitz, some of which we reviewed yesterday, they talk
8 about how they need to let the local police know what they're
9 up to.

10 So here's Exhibit 4019-B.

11 Mr. Gallowitz says: Call local PD, let them know we
12 are out there. Mike says: Yes, for sure.

13 Mike says: Plate number and your vehicle type?

14 Eric gives his plate number and vehicle type.

15 That's the sort of thing that happened. Again, just
16 use your common sense. You're out committing a crime, and
17 you're going to tell the local police? But it's more than
18 that. There's other circumstantial evidence of Mike's
19 innocence.

20 If you're doing unlawful activities, are you going
21 to keep detailed reports of what you do? So we looked a few
22 minutes ago at the written retainer. We don't see a lot of
23 written retainer agreements for people doing unlawful things.
24 But beyond that, Mike McMahon does detailed reports, and
25 Exhibit 3034 is one of them. And these reports are critical

1 evidence in this case, and the Government uses them, as well,
2 to talk about what Mr. McMahon did. And we'll come back to
3 some of that a little bit later. But this is a report where
4 Mike details his investigative actions. It's one of the
5 reasons why they're not disputed. He did them, and he wrote
6 reports about them. Just not the sort of thing you do if
7 you're working for a foreign government unlawfully.

8 And I should note that you heard evidence in this
9 trial that part of the scheme that the Chinese had was to ask
10 the others who were involved in this case to delete all of
11 their chats? No such instruction was given to Mike McMahon,
12 because he was not trusted, nor did he delete anything.

13 Beyond, though, his detailed reports, you've also
14 seen in evidence his invoices which also set forth exactly
15 what he was up to. Again, the Government argues that somehow
16 the way he put money in his accounts, the way he did his
17 taxes, I'll talk about all of that, somehow were meant to
18 conceal what he was up to. But here, he's doing detailed
19 invoices about what he was up to. He's doing detailed reports
20 about what he was doing. This is the exact opposite of what
21 one does if one's trying to conceal their activities.

22 And I should note in that regard that you heard a
23 good deal of testimony in this case about the fact that Mike
24 McMahon had a Verizon cell phone. That cell phone allowed
25 him, for example, to be tracked using cell site data. If he,

1 like some of the others, some of the Chinese in this case were
2 using WeChat, and, you know, there's WhatsApp here in the U.S.
3 and Signal and there's other of these sorts of things that
4 allow you to use your cell phone secretly, that would be one
5 thing.

6 But Agent Wheeler, in talking about the cell site
7 data, described this, to the effect of using something like
8 WeChat, which is then you can't track that way. Mike didn't
9 do that. He used his cell phone. He had it on. He didn't,
10 you know, wrap it in aluminum foil, whatever you have to do so
11 it wasn't emitting a beep so that he could be tracked. He was
12 transparent with what he was doing, to the world and even to
13 law enforcement.

14 I should make one more point about law enforcement.
15 There's been some discussion, and I'll come back to that, as
16 well, a little bit later, of Greg Finning, a friend of Mike
17 McMahon's who worked at the DEA. Mike reported this matter
18 not just to local police, but also to the DEA. And I asked
19 the DEA witness who was present whether she knew whether
20 Mr. Finning was doing some sort of investigation into Chinese
21 money laundering and the like; she didn't know.

22 But here's the point. If you are -- and I'm
23 repeating myself a little bit, but if you're trying to hide
24 what you're doing through the way you do your taxes, through
25 the way you deposit money, because you -- that would be

1 consciousness of guilt, that would be evidence that you knew
2 you were doing something wrong, that would be evidence that
3 you knew you were working for the Government of China when you
4 shouldn't be. None of that is present here.

5 Two more points in terms of the circumstantial
6 evidence that we would ask you to think about as you decide
7 whether the Government can fulfill their obligation, if
8 they're going to get a conviction, to show you that Michael
9 McMahon knew that he was working for China.

10 One is, you've heard evidence of how much money Mike
11 made in this case, \$19,000. We'll come back to that, because
12 he didn't make \$19,000. He also had to pay -- well, actually,
13 we'll do that right now. He also had to pay the fees of
14 others.

15 So the Government provided you with the top part of
16 this demonstrative exhibit, which it says: McMahon Payments
17 and Expenses. And that's where they get their number of
18 \$19,000. They did not, and this will be a theme, provide you
19 the bottom part, which you know some of it from the testimony,
20 and the rest of it is in evidence in documents, of expenses
21 that Mike had in connection with this investigation, paying
22 other investigators, for example, getting records, and so
23 forth. And those amount to, I can't read it, but something
24 like \$8,000. So the total he makes is actually \$11,000.
25 That's, of course, relevant to the tax issue as well.

1 But the point is that, do you think that somebody
2 who knew they were working for the Government of China would
3 put themselves on the line, would risk their whole careers and
4 lives for \$11,000? It just doesn't make sense.

5 And when he was arrested on October 28, 2020, Mike,
6 who was, you've heard, an experienced cop who had, himself,
7 interrogated suspects, spoke to the authorities for an hour
8 and a half, fully cooperating with them, as they said, and
9 admitting, as we have with all of you here today, exactly what
10 he did, which was surveillance. That is not the conduct of
11 somebody who is trying to hide what he did. That is not the
12 conduct of somebody who knew that he was working for a foreign
13 government.

14 Ladies and gentlemen, these common sense questions
15 I'm asking, would someone have done this, really answer
16 themselves. And just as Judge Chen will instruct you, the
17 lack of evidence that Mike knew, that he was ever told, that
18 he ever told anyone that he was working for the People's
19 Republic of China creates reasonable doubt. So this
20 circumstantial evidence is powerful evidence, indeed, not
21 against Mr. McMahon as the Government says, but in favor of
22 him.

23 But let's turn to their arguments about what they
24 say shows that Michael McMahon, circumstantial evidence that
25 they say shows that Michael McMahon knew he was working for

1 the People's Republic of China.

2 Let's start here. Critical piece of evidence in
3 this case was the article from the China Daily. It's
4 Exhibit 434, and you remember that. I want to address this
5 article, because this becomes a critical piece of evidence as
6 to whether Mike McMahon -- it should have caused him to know
7 that he was working for China. But a couple things about it.
8 First, as you can see, it confirms that the subject of his
9 investigation, Mr. Zhu, was charged with embezzlement, stolen
10 money, which is exactly what Mike thought he was trying to
11 locate and recover.

12 Now, the Government insinuates that he should have
13 known he was working for the Chinese Government because that
14 poster mentions something called Operation SKYNET. Look at
15 every single communication in this case, and you will never
16 find a single communication to Mike McMahon that says what --
17 that mentions Operation SKYNET, that says what Operation
18 SKYNET was supposed to be, that mentions Operation FOXHUNT,
19 which you've also heard something about. And based upon, and
20 it's your own recollection and perception that governs, but
21 based upon what I heard, it seems like the people who know
22 about this are either experts, like Professor Wedeman, who
23 spent his entire career studying China, or Chinese people like
24 the victims of this offense who quite understandably are very
25 focused on these Chinese programs. You will recall that Eric

1 Gallowitz, for example, had never heard of it either. And you
2 heard that Special Agent Dietz, who is from the U.S.
3 Attorney's office here in the Eastern District of New York,
4 said he himself had never heard of it.

5 And I questioned Agent Dietz and said -- here's my
6 question and answer, this is on pages 467 and 68 of the
7 transcript, for your notes.

8 QUESTION: So do I -- it says: Interpol launches
9 global dragnet for 100 Chinese fugitives.

10 And I ask him: This is one of the documents that
11 you testified about earlier, correct? And it says -- it
12 says -- it's called Operation SKYNET. Do you see that?

13 ANSWER: I don't see that. I can't read that, but I
14 recall that.

15 QUESTION: It says it's called Operation SKYNET.
16 Have you ever heard of Operation SKYNET?

17 ANSWER: I have never heard of Operation SKYNET.

18 And you examined these documents, correct?

19 Yes.

20 And they don't explain what Operation SKYNET is, do
21 they?

22 I don't recall 100 percent of it, but no.

23 One other piece of information that you heard during
24 Professor Wedeman's testimony is worth your consideration. I
25 asked Professor Wedeman:

1 Professor Wedeman, you testified just in response to
2 Mr. Tung's questions that you had read press reports of the
3 FBI director warning Americans about being approached by
4 China, or words to that effect, right?

5 Yes.

6 QUESTION: And I was trying to figure out when that
7 was, and let me ask you this: I see an address by Director
8 Wray, the Director of the FBI, on October 24, 2022 to that
9 effect. Is that the one you're thinking of?

10 He says: At the Hudson Institute -- I say: At the
11 Hudson Institute?

12 He says: That's the one I'm thinking of.

13 If private investigators -- if Americans knew about
14 this Chinese program to repatriate citizens, would the FBI
15 director have to tell them? Would somebody -- would people
16 have to be warned? The reason this is important is because
17 the Government's argument is that just looking at this,
18 Mr. McMahon should have known that he was involved -- being
19 involved in some criminal case.

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21 (Continued on the next page.)

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1 MR. LUSTERBERG (CONTINUING): But the evidence is,
2 and you've heard this from one of the government agents -- I'm
3 not exactly recalling who it is right now -- that sometimes
4 there's criminal investigations in civil matters that operate
5 side by side.

6 THE COURT: Mr. Lustberg, I am so sorry to do this
7 to you, but it is just a couple of minutes before 1:00 .

8 MR. LUSTBERG: Sure.

9 THE COURT: And unfortunately because of my
10 schedule, we need to break now --

11 MR. LUSTBERG: Okay, no problem.

12 THE COURT: -- for lunch.

13 MR. LUSTBERG: Okay.

14 THE COURT: So obviously I will let you restart and
15 maybe recapitulate where you ended just now.

16 MR. LUSTBERG: No worries. Thank you.

17 THE COURT: And we will resume at 2:00.

18 So remember, ladies and gentlemen, do not talk about
19 the case, keep an open mind and do not do any research.

20 Thank you, Mr. Lustberg.

21 MR. LUSTBERG: Thank you.

22 THE COURTROOM DEPUTY: All rise.

23 (Jury exits.)

24 THE COURT: Folks, I will see you at 2:00.

25 (Luncheon recess taken.)

1 A F T E R N O O N S E S S I O N

2 (In open court; jury present.)

3 THE COURTROOM DEPUTY: All rise.

4 (Jury enters the courtroom.)

5 THE COURT: Please be seated, everyone. Welcome
6 back, ladies and gentlemen. I hope you had a very good lunch.
7 Mr. Lusterberg is going to continue with his summation.

8 MR. LUSTERBERG: Thank you, Your Honor. I'm getting
9 there.

10 Just to accept Judge Chen's invitation to recap a
11 bit, I started by talking a little bit about how there was no
12 direct evidence against Mr. McMahon, I then went through the
13 circumstantial evidence that we say shows that Mr. McMahon did
14 not have -- did not know that he was working for the Chinese
15 government, that he, in fact, was himself lied to and deceived
16 and I started to talk about the government's proofs in terms
17 of the circumstantial evidence to which they were pointing.

18 So, now, I'm going to continue with that and then
19 I'm going to -- I'll finish up by talking a little bit about
20 the interstate stalking charge and then I will be done,
21 probably about another half hour or so.

22 So, one of the things they pointed to, the
23 government, Ms. Arfa pointed to in her summation was the
24 passage you remember from Mr. McMahon's statement where he
25 said, quote, I think he had mentioned to me that they were

1 trying to get him to come back to China so that they could
2 prosecute him, and the Government there cut off that statement
3 and didn't go on to remind you of what was said just a couple
4 minutes later on that videotape. So Ms. Canti will pull that
5 up for you now, hopefully.

6 There we go.

7 And, so, just a few pages later, the DOJ agent says,
8 and that was, you recall was Agent Ross, was, did she say what
9 the consequences were like you was he gonna, and Mr. McMahon
10 says, no, he didn't say nothing, just to, you know, pay back
11 the money basically. Agent McCarthy says, okay, and the DOJ
12 agent said, and did they mention, you know, jail or doing
13 time? And Mr. McMahon says, no, that was never discussed.

14 So why do I bring that up with all of you? For a
15 couple of reasons. First, I think it's important to just set
16 the context for the statement. Mr. McMahon had been, I
17 believe that the agent said this was about -- it was early in
18 the morning. Mr. McMahon had been arrested early in the
19 morning. He was being questioned about events that had
20 occurred four years ago, four years before, I should say. He
21 had never been spoken to by law enforcement during that time
22 period, and he made the statements that they attributed to him
23 but he also reiterated his view of what the mission was here
24 to, you know, pay back the money basically, that that's what
25 he was trying to accomplish. And, of course, that was

1 entirely consistent with what he understood his purpose was,
2 to take steps to get his client repaid.

3 And there's numerous places in this record that
4 you've heard where that is perfectly clear. For example, if
5 we could go to Government Exhibit 805-B page 20, Johnny Ju
6 says to Mr. McMahon, is there any way to get all the assets
7 and property info from the company but not only the bank
8 records? Is there any way you can track their hidden assets
9 like stock, bonds, investment activities, and Mr. McMahon
10 says, yes, I can possibly do that, I can run the company and
11 the office numbers. And there -- and elsewhere.

12 So let's take a look at Government Exhibit 2029, so
13 that last quote was Johnny Ju. This quote is from Eric Yan,
14 again, you remember that's an alias for Hu Ji, and he says on
15 the first page, okay -- I'm sorry, Mike says, okay, thanks for
16 clarifying. I'm meeting my contact tomorrow and see what he
17 can do about accessing China bank. I will also discuss
18 obtaining offshore accounts of subjects, get pricing for you.

19 The next page, Eric makes clear that his request is
20 a background of somebody named Joseph Yang, which we haven't
21 heard any evidence of, and then offshore property
22 investigation of Xu Jin, Yu Fang, and Xu Xinzi, an
23 investigation of an account.

24 Again, I'm just raising this to reiterate really
25 what Mr. McMahon understood he was doing was trying to recover

1 assets for a party that had been embezzled from. That was his
2 mission. It was not his mission to work with the Chinese
3 government and he was deceived into believing he was not
4 working with the Chinese government to put somebody in jail.
5 At 7:00 o'clock in the morning, he uses a word, prosecute, and
6 I understand, you know, why the government jumped all over the
7 use of that word, but I would ask you to take the whole thing
8 in context, to look at all of the evidence and to evaluate
9 what Mr. McMahon's actual intent was.

10 But the government goes on and they point to other
11 things that I want to address with you now. So, you've heard
12 their summation and you saw during the trial their evidence
13 about deposits that Mr. McMahon made into accounts other than
14 his business account. In particular, into his joint account
15 with his wife, Martha Burn, referred to as Mary McMahon, as
16 well as a payment of \$5,000 in cash. So I would like to just
17 briefly address that with you.

18 Cash, it turns out, is still money and it works and
19 you can get paid in cash, and Eric Gallowitz made clear you
20 can get paid in cash. So Ms. Arfa's statement that there had
21 to be a crime because he got paid in cash is just wrong. But
22 beyond that being just wrong, what ties that. Their argument
23 is that because he got paid cash he must have known he was
24 working for the Chinese government. Think about the missing
25 link to all of that. It's just not there.

1 But remember, also, the context in which that cash
2 was paid according to the government's own argument. What
3 they say is that this cash was paid at the Panera Bread, a
4 public place in Paramus, New Jersey, with a ton of people
5 around. Again, it just doesn't sound in deception or hiding
6 payments or anything like that.

7 But be that as it may, let's take a quick look at
8 what the government's -- what the payments to Mr. McMahon
9 were. That's the government's demonstrative. And what you
10 see -- and Ms. Arfa candidly pointed this out, is that the
11 money goes into three different places, that's not all cash,
12 right? You know, I can understand the argument that if all
13 the payments were in cash, it would be a big deal it was in
14 cash. But some of it is wired, some of it is paid by check,
15 some of it is paid in cash, some of it goes into his account,
16 some of it goes into his joint account with his wife, some of
17 it goes into his child's account.

18 Now, just think to yourself, if you were going to
19 hide money, would you put that money in an account in the name
20 of your son which is the exact same name as you? I mean, you
21 see that, the son's name is Michael McMahon, too. Would you
22 put that money in an account in the exact same bank as your
23 own account? Would you put that account with that money into
24 your joint account with your wife? It just doesn't make
25 sense. It's not hiding anything from anybody. And there's

1 nothing wrong with a person who has a -- he has his own
2 business as an investigator. He could have easily taken the
3 money into his account -- I'm sorry, could have taken it into
4 the business account, taken it out, put it into his joint
5 account, or taken it out and spent it. Instead, it goes into
6 the -- into his joint account.

7 I should note that you heard some evidence in this
8 case, and it's Exhibit 3061, that their came a time where
9 their were actually difficulties that -- with people who were
10 paying Mr. McMahon were having in depositing the money into
11 his business account. So one of the reasons it goes into
12 the -- into his personal account as opposed to going to the
13 business account is because they were having trouble -- they
14 were simply having trouble depositing it.

15 The government argues that that somehow is evil,
16 that that somehow shows criminality, that that somehow shows
17 knowledge that he was working for the Chinese. In fact, what
18 is shows is their was a transaction difficulty. But this is
19 sort of the pattern this prosecution is to take everyday
20 innocent actions and somehow try to make them seem sinister in
21 order to convict Mr. McMahon. It's not just not right.

22 And one more thing because they talk about the money
23 going into Mr. McMahon's son, Mikey's account, which was, as
24 you heard, a student account. You saw evidence in this case
25 that he was born in 1968, and the theory is that that was

1 somehow done to hide money. And, again, think to yourself
2 whether it makes sense that the way you hide money is by
3 putting it in a different account in same name, albeit a
4 different person, his son, in the same bank and so forth. But
5 look what happens to that money. At the point in which they
6 put that money in, and you'll have the account statement --
7 actually, Ms. Canti, if you can pull that up, it's
8 Government Exhibit 403-I. And Government Exhibit 403-I shows
9 what happens to the money in that account.

10 First of all, it's not like the money goes in on day
11 one and comes out on day two. It sits there for a little
12 while but it's put in the account when the account has like
13 \$50 or so of balance. I think it's \$58 or something like
14 that, and it gets used by Mr. McMahon's son to pay everyday
15 expenses at that point such as bagels and burgers and pizza
16 and Dunkin and it looks like vapes. Until at some point,
17 Mr. McMahon's son gets paid. You can see he gets paid by the
18 job he has in construction, you can see that, and at that
19 point, it turns out that the McMahon's also have a credit card
20 bill due, and you saw that information about the credit card.
21 So they take out the \$3,000 to make the credit card payment.
22 But it's just a stretch to say that this is somehow evidence
23 of criminal intent. It's just not fair and close to the mark
24 to say that it is evidence that Mr. McMahon was somehow acting
25 as an unregistered agent of China. Does this sent of

1 transactions make it sound to you like what he's trying to do
2 is -- that somehow it shows that he knew he was working for
3 China? I just can't make that work as a matter of logic. It
4 doesn't even as a matter of hiding the money because it's such
5 a bad job of hiding it, but beyond that, how does this show
6 knowledge that you're working for China? It just doesn't make
7 sense.

8 The government also, to move on to their next point,
9 they make some arguments with regard to taxes, and Ms. Arfa
10 argued that Mr. McMahon did not report this income on his tax
11 returns in an effort to hide it from the government. That was
12 her -- that was her argument. Let's take a look at
13 Exhibit 452 which was introduced at trial, and Ms. Arfa
14 actually had a different demonstrative that she used this
15 morning which I don't have, but the basic argument is that a
16 certain amount of money came into the -- into his business
17 account and he declared a certain amount of money on their
18 taxes. But think about what's missing there. And I asked the
19 agent who was testifying about it. The amount of money that
20 you put on your tax returns, and you saw the tax returns, is
21 called gross profit, that's profit before taxes, but profit
22 requires you to look at what you've took in and what you've
23 paid out and what you know, because you heard the evidence in
24 this case, is that Mr. McMahon did not even get all of that
25 profit. What he -- in order to calculate his profit, you

1 would have to look at what he took in and what he paid for the
2 other investigators --

3 MR. HEERAN: Objection, Your Honor.

4 THE COURT: Overruled.

5 MR. LUSTERBERG: With what he paid out to
6 Eric Gallowitz for example, and the other expenses that he --
7 that he had. It just stands to common sense. But even
8 leaving that aside, there's -- you know that he got paid
9 \$19,000. They're saying that he had -- that he had \$50,000 or
10 some amount like that in total -- in total money into his
11 account and only declared less than that. Well, how do we
12 know that what he didn't declare was the money from these
13 transactions? I mean, there may be other transactions that
14 for whatever reasons were not declared. There just was no
15 analysis that the government did to show you that there was
16 any kind of tax issue. And beyond that, he's not charged with
17 tax evasion, he not charged with filing false returns, he's
18 not charged with all of this. Tell me, I just don't get it,
19 how all of that amounts to hiding the fact that he was working
20 for the Chinese government from our government.

21 In the worst case scenario, there was taxes that he
22 should have paid that he didn't but we don't even know it was
23 on this income as opposed to other income because we know from
24 that chart there was income. He made \$19,000 gross on this
25 over a two-year period and there's much more money than that

1 on these charts, so we don't even know what it is that he
2 didn't declare and it's unfair and it's unwarranted to say
3 that what this shows is that he was trying to hide these funds
4 from our government because, somehow, he was trying to hide
5 from them that he was working from the Chinese. It just
6 doesn't make sense.

7 And think about it from a common sense perspective
8 when you consider how much weight the government is putting on
9 that fact as a basis for saying that he was hiding -- somehow,
10 that he was working for the Chinese government from them.

11 The government also seeks to blame Mr. McMahon for
12 obtaining information from Greg Finning, the Assistant Special
13 Agent in charge of the New York -- I think it was the New York
14 DEA office, but as the witness who actually testified on that,
15 Neviene Habeeb made clear that if someone did anything wrong,
16 it was Mr. Finning. It was somebody within that agency.
17 They're blaming Mr. McMahon for obtaining information from his
18 friend, but there is not one email, there is not one text,
19 there's not one piece of evidence, there's not one witness who
20 says in doing that, he -- for that matter, even Mr. Finning,
21 he knew that he was doing something wrong. And he may not
22 have been, they haven't put in any proof that he did anything
23 wrong.

24 There was some proof adduced that Mr. Finning should
25 not have shared that information with him, that's true, but to

1 scribe that to him, to say that that shows that he was trying
2 to hide the fact that he was working for the Chinese
3 government, to hide the fact that is just something that's
4 just -- again, use your common sense and ask yourself whether
5 that makes sense to you.

6 Finally, in terms of the government's proofs, the
7 government argues that Mr. McMahon's knowledge that he was
8 working for the Chinese can somehow be shown by virtue of his
9 having violated the rules of the New Jersey
10 Motor Vehicle Commission, which you remember I thought was
11 called something else. But -- and, in fact, let's look at
12 that evidence and think about it a little bit.

13 It is the fact, and we never disputed, and the
14 evidence shows that Mr. McMahon ran plates relevant to this
15 matter on April 6, 2017. Doing that generated a record. It
16 generated that record that's before you now, Exhibit 408-H,
17 where you can see that Mr. McMahon ran those plates on
18 April 6, 2017. So far from hiding, by doing what he did, by
19 using that database as opposed to any of the other databases
20 that Mr. Gallowitz talked about as out there, he made it clear
21 to the world, or at least to the New Jersey MVC what he was
22 doing.

23 So the government argues, well, he violated his user
24 agreement by passing along that information, and in
25 particular, violated paragraph 9 of the user agreement which

1 says that the program participant is strictly prohibited from
2 using commission records to conduct surveillance, and it goes
3 on.

4 But remember what Ms. O'Connor from the MVC told
5 you. She told you that the MVC can and does audit people's --
6 the users of this CAIR program, CAIR is C-A-I-R, and in
7 particular, that Mr. McMahon had been audited, and he
8 explained in connection with that audit, that he was running
9 plates in order to show what the -- that a car was owned
10 rather than leased. And think about that and that was
11 apparently okay because he gave that answer to MVC and they
12 appeared to be satisfied.

13 Here, that's -- again, goes exactly to this issue of
14 trying to ascertain assets. Whether you own or lease a car
15 has a great deal to do with what your assets are if you're
16 trying to recover assets. And by the way, if you look at the
17 exhibit that I talked about, that is Exhibit 408-I, that's
18 the -- okay, this is something else. I don't know if you have
19 408-I.

20 Well, actually since 408-D and C are up, I will just
21 mention that Mr. McMahon was not hiding the fact that he was a
22 private investigator who was getting information pursuant to
23 this New Jersey MVC CAIR program, and it explains in his
24 initial application which was D, what his purpose was, which
25 was to, you know, to be able to get information for people

1 whose law firms he was working with including to investigate
2 fraud and 408-C says to -- the next year, to get information
3 on the cases he's working on with various law firms.

4 But the point is here, when you look at 408-I, which
5 is this audit that was done, what you see is that the -- he,
6 you know, he explained that he did this audit in order to
7 determine whether a car was leased or owned. I asked
8 Ms. O'Connor, was that an appropriate use, under the
9 agreement, of the database, she said yes, and that's what's
10 going on here and I'm not just making that up. Because if we
11 look at Exhibit 805-B page 9, you'll see that Mike sends
12 Johnny a screen shot and says exactly here, the car is owned,
13 not leased. Johnny responds, got it. No finance, no lease.
14 Mike responds, correct.

15 That was the purpose of this. So before we start to
16 think what he was doing was so wrong in terms of violating
17 this user agreement in New Jersey Motor Vehicle Commission, it
18 apparently isn't. And beyond that, how, again, does it show,
19 in any regard, that he knew he was working for the Chinese
20 government which is what Counts One and Two are about.

21 So, respectfully, each of these examples that the
22 government raised represents, in my view at least, the
23 government stretching to make criminal that which is not and
24 which, in some cases, for example, where Mike McMahon puts his
25 money is really the perfectly innocent actions of everyday

1 life. And your role to well and truly try this case, which
2 was the oath that you took, you shouldn't be swayed by this
3 kind of effort to examine a person's life or turn it upside
4 down or look at it in microscopic detail to question this
5 transaction of that violation of an agreement, to look at who
6 you associated with, because Judge Chen will tell you that
7 guilt by association is not allowed, to take a picture of
8 three people in a Panera Bread and say, see that, there's a
9 crime and not just any crime but the crime of being an agent
10 of a foreign government.

11 The efforts that the government makes to try to find
12 a crime here speak volumes. What they show is that there
13 really is no real evidence, which is where I started. And
14 that lack of evidence pretty clearly is not for lack of trying
15 on their part. The evidence is lacking with regard to Counts
16 One and Two because Mike is innocent. He's certainly not
17 guilty beyond a reasonable doubt. So let me conclude by just
18 addressing the stalking charges for a few minutes.

19 So, there's this charge of interstate stalking and
20 the government put up and Judge Chen will instruct you that in
21 order to be convicted of interstate stalking, the government
22 has to prove beyond a reasonable doubt, first, that the
23 defendant traveled in interstate or foreign commerce as
24 charged in the indictment, second, that he traveled in
25 interstate commerce with the intent to harass or place under

1 surveillance with the intent to harass or intimidate, in this
2 case Mr. Ju, Ms. Liu, and Xu Xinzi, and, third, that in the
3 course of the result of such travel, the defendant caused,
4 attempted to cause, or reasonably expected to cause them
5 substantial emotional distress. I'm going to outline for you
6 why I think those elements are not met, not even close, with
7 regard to Mr. McMahon and each of these requirements.

8 First, there is no proof, and the government
9 conceded that Mr. McMahon never traveled in interstate,
10 period. He was in New Jersey the whole time and that's why
11 the government told you this morning, they admitted that to
12 you, but said that he aided and abetted somebody else's
13 travel. You'll have an instruction about what aiding and
14 abetting is, but, you see, you have to have knowledge of what
15 they're doing and I just didn't see any evidence in this case
16 that Mr. McMahon did anything to aid and abet somebody else's
17 interstate travel. If you can find it, then that element will
18 be satisfied. I'm just not seeing it in that record.

19 But leaving that technical requirement aside,
20 there's also not one iota of proof that Mr. McMahon harassed
21 or intimidated anyone, let alone that he agreed to do so, much
22 less that he intended to and expected to cause substantial
23 emotional distress to the alleged victims here. So why do I
24 say that?

25 First, and really most fundamentally, there's no

1 evidence that Mr. McMahon was ever seen by any of them. We
2 had the opportunity to question each of the those three
3 victims, none of them had ever met, talked to, or seen
4 Mr. McMahon and, he remained covert throughout the entire time
5 of this -- of this surveillance. No one ever reported seeing
6 him, other than the other -- maybe, and we don't even know if
7 it was him, one of the other -- one of the people who was
8 actually doing surveillance, that is Hong Ju Jin, directly for
9 the Chinese. And not only did that surveillance remain
10 covert, it even remained covert in the face of a proposal by
11 Eric Gallowitz that it not be covert.

12 You remember, and the government pointed to this
13 morning, that Mr. Goldberger said, may be overt surveillance
14 in their face, sit in front of the house, pictures, videos,
15 scare them. And Mr. McMahon said, yeah, possibly, we did that
16 in Little Ferry, obviously referring to a different
17 investigation, and then said, not sure it worked, but it
18 matters not, because as you also saw, this was -- this whole
19 idea was vetoed. So the idea there was an agreement to do
20 this is just completely unsupported by the evidence.

21 To the contrary, there was a lack of an agreement.
22 There was -- and somebody else, not Mr. McMahon, proposed it.
23 The government says, well, he should have reacted more
24 strongly and said no way or something like that, but that's
25 not harassment to say no way. It didn't happen. It was not

1 agreed to. Mr. McMahon ran it by the client who said no.

2 That's the critical evidence here. There was never
3 any agreement. Instead what happened here was good old
4 fashion covert surveillance the whole time. But one of the
5 things that the government argued today and argued as well in
6 its opening, is that Mr. McMahon provided the addresses that
7 were used so that surveillance could take place so that they
8 knew where Mr. Ju was and where his daughter was. There's at
9 least reasonable doubt with regard to that. It's a little
10 unclear and it's a little unclear because here's one thing you
11 know; Mr. McMahon was not the only one doing surveillance.

12 So, how do we know? What is the evidence that he
13 was the one who provided the addresses? There were other
14 people doing surveillance at exactly that time. There's no
15 doubt that Mr. McMahon did surveillance and traced them to the
16 house, but there's no communications that would indicate that
17 while this other surveillance was going on, that they were not
18 the ones to find it. I don't know what the answer is, but you
19 have to know what the answer is, beyond a reasonable doubt, in
20 order to convict him.

21 But, second, you heard something else during this
22 trial and it was summarized by Special Agent Tarkin during his
23 testimony, that the Short Hills address and the Warren address
24 were, according to public records, both owned -- both of those
25 residences were owned by the same company, a company called

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1 J Lifetime, LLC. I told you I'd come back to that at some
2 point. That company was the company as to which Mr. Ju's
3 sister-in-law, Liu Yan, was the managing member. You will
4 remember that I asked her about that. She actually didn't
5 really want to answer questions about it, but she --

6 MR. HEERAN: Objection, Your Honor.

7 THE COURT: Overruled.

8 Yeah, this is argument, ladies and gentlemen.

9 MR. LUSTERBERG: So this was public information that
10 was out there. No surveillance was really even required.
11 Moreover, let's go to the incident that occurs in September of
12 2018, which I'm sure my colleague Mr. Goldberger will talk to
13 you about in a few minutes.

14 (Continued on the following page.)

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1 (Continuing.)

2 MR. LUSTERBERG: That's where the two men came to
3 the house there in Warren and knocked on the door and put
4 notes on the door and so forth.

5 The Government argues that somehow those people --
6 think they argue that somehow those people got the address of
7 that place from Mr. McMahon. But there is no evidence that
8 that's true. In fact, you know because you heard the
9 testimony from Kuang Zebin that they got instructions about
10 where to go from somebody named Chaohong Chen, and no
11 evidence, none, was produced that linked Chaohong Chen to
12 Michael McMahon or to any of the people with whom Michael
13 McMahon was in touch. No evidence of it. So this idea that
14 somehow he provide the address, even assuming that he was the
15 one who found it, so that that incident could took place is
16 completely based on speculation.

17 Likewise, the Government argues that Mr. McMahon
18 provided the information with regard to the whereabouts of the
19 address of Mr. Zhu's daughter, Sabrina, in California. But if
20 you read Mr. McMahon's report, what he says -- and that report
21 is in the fall of 2016 -- is he puts her address at the time
22 in at Stanford University. I'm not going to go into the
23 specific addresses. But he says in his report -- and this is
24 Exhibit 3028 -- it appears Xinzi Xu is a graduate student at
25 Stanford University. She lives in the Kennedy graduate

1 residences. But that wasn't true. He got it wrong. He got
2 it wrong because she had actually graduated, you heard
3 evidence of this from Stanford, in May of 2016, and she
4 testified that by the fall of 2016, she was no longer living
5 there.

6 Why is that relevant? It's relevant because the
7 Government's argument is that somehow, Mr. McMahon gave
8 information that allowed the harassment of her to continue.
9 But there was no harassment at that address, and, in fact, the
10 harassment of her to which he testified, had to do with
11 Facebook posts. And you'll remember that Facebook post, it
12 was Government Exhibit 107. But the Government showed no
13 link, none, whatsoever, between the author of that report --
14 it was someone named Tony Li -- and Mike McMahon, not
15 directly, not indirectly, not through Jason Zhu, not through
16 Johnny Zhu, not through Eric Yan, nothing. So they're trying
17 to build links that are just not supported by the evidence,
18 and I would ask you to hold them to their burden.

19 Finally, in that regard, finding the address was not
20 even necessary to harassment. Here's what I mean by that:
21 You heard what happened, that in 2019. Now, just to back up,
22 Mr. McMahon didn't do anything after April 2017 in this case.
23 The knock on the door and all that in Warren occurs in
24 September 2018, and then letters are sent, that you heard
25 about, in 2019. There's nothing that links Mr. McMahon to

1 those letters. There's -- and those letters go to the Short
2 Hills address, but were conveyed to the Warren -- to Mr. Xu
3 living in Warren.

4 So first of all, what does that tell you? It tells
5 you that if the Chinese wanted to harass Mr. Xu, they could
6 send stuff to Short Hills. They didn't even need that Warren
7 address, because once it was sent to Short Hills, it was
8 conveyed quickly, and there was some cross-examination about
9 this, to Short Hills. And that stuff includes the video that
10 you saw earlier this week. Although, if I recall that
11 testimony, I'm not sure if that was ever actually opened. But
12 either way.

13 And I should say one last thing: It really bears
14 just mention that to me, at least, there's real doubt, as much
15 as Ms. Arfa says that the recipients were terrified, I'm sure
16 they were scared. Mr. Xu made clear that he was scared to go
17 back to China where he would face punishment for crimes in
18 which they were accused, who knows whether justly or unjustly,
19 and, in fact, I think he said he was afraid of being executed.
20 But there's some reason to doubt, whether on top of that fear,
21 he suffered substantial emotional distress as a result of
22 anything that Mr. McMahon did during that time that he was
23 involved in the surveillance. Just a few facts in that
24 regard. Again, Mr. McMahon was never seen, so there was
25 really nothing that he specifically did.

1 But remember this, when Mr. Xu's father was here,
2 and you heard testimony about this, what did the family do?
3 They essentially turned him over to the people who were in
4 Newark, Tu Lan and them, who they understood to be the Chinese
5 authorities. Makes you wonder how scared they really could
6 have been. And likewise, Liu Yan testified that she had a
7 list of phone numbers and she started calling the people with
8 those Chinese phone numbers, the same people that you saw in
9 this chart earlier. And so their too, it just makes you
10 wonder, were they really that as frightened or testified as
11 Ms. Arfa describes. They did say they were scared. I will
12 note that Mr. Xu said the first time he really felt physically
13 scared was in September 2018 when people came to his house,
14 which again, is a year and a half after Mr. McMahon is no
15 longer involved in any of this.

16 Let me say this, and I want to conclude now: I
17 really understand why the Government wishes to protect this
18 family from the People's Republic of China. I really do. The
19 evidence in this case does show just how far China is willing
20 to go to repatriate those who they wish to prosecute, as I
21 said, whether justly or unjustly; doesn't matter. And the
22 video you saw earlier this week is a great example of their
23 incredible manipulativeness and deceit in doing that. You
24 heard that there's no extradition treaty with the U.S. And
25 they shouldn't be allowed to act in the extra-legal way that

1 they have, and the Xu family should not have been a victim of
2 any of that, it should not happen. But honestly, neither
3 should Michael McMahon, a private investigator trying to make
4 a living after a career as a New York City Police Officer. By
5 2016, when Mike first became involved in this case, the
6 Government had already begun its investigation. You saw
7 around that time, the video of their interview of Johnny Zhu
8 where they talked to him but made sure that he could make his
9 flight and go back to China. Did they ever reach out to Mike
10 to warn him that he too was being lied to and manipulated by
11 the Chinese?

12 MR. HEEREN: Objection, your Honor.

13 THE COURT: Sustained.

14 Careful, Mr. Lusterberg.

15 MR. LUSTERBERG: I'm done.

16 They waited, and four years later, they rest
17 arrested him --

18 MR. HEEREN: Objection, your Honor.

19 THE COURT: Overruled.

20 Just finish your closing.

21 MR. LUSTERBERG: Okay. And now they seek to convict
22 him.

23 Today, only you can prevent the injustice that such
24 a conviction would engender. But you shouldn't have to do
25 that because -- not just because Mike is a good person or

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1 because the Government didn't protect him, as it should
2 have --

3 THE COURT: Sustained. Sustained, Mr. Lusterberg.
4 I did warn you. Please.

5 MR. LUSTERBERG: You should do that because a
6 not-guilty verdict is the right verdict based upon the
7 evidence. You should do that because there's no evidence that
8 Mike McMahon had any idea that he was working for China and
9 because the circumstantial evidence, in fact, points the other
10 way. You should do that because his covert surveillance
11 activities as a private investigator for five days, separated
12 by six months, did not amount to stalking or harassment of
13 anyone. You should do that in order to avoid the very worse
14 things that could happen here or in any case, the conviction
15 of an innocent man.

16 Thank you very much for listening to me.

17 THE COURT: Thank you, Mr. Lusterberg.

18 Ladies and gentlemen, let me just reiterate that you
19 should completely disregard any suggestion that the Government
20 had some duty to protect Mr. McMahon. Obviously, that was
21 argument; it's not evidence. But you shouldn't even consider
22 that whatsoever as argument.

23 All right. Let's mute that.

24 Mr. Greenberger. I'm so sorry, Mr. Goldberger.

25 MR. GOLDBERGER: Yes.

1 MR. GOLDBERGER: Good afternoon.

2 Is that better?

3 THE JURY: Yes.

4 MR. GOLDBERGER: Okay. Good afternoon, everybody.

5 In my many, many, many years of doing this, this is
6 the best example of when people say that in the United States,
7 we have an adversarial system of justice okay. Adversarial
8 meaning that it's the United States against. If it's a state
9 case, it's the People of the State of New York against. If
10 it's -- it's always adversarial. There are places in the
11 world that do not have adversarial systems, but this is what
12 we've had from the beginning, and this is what we live with,
13 and there are very good things about it, and there are some
14 things that are not so good about it.

15 And so one of the problems with the system is that
16 sometimes, the Government, as in this case, goes off a little
17 bit from where they should be. And by that, I mean, my client
18 should not be here. Here's why: So let's talk about it.
19 Number one, he was called by Mr. Chen. You've heard that name
20 before. Mr. Chen is from California. Mr. Chen, as you may or
21 may not recall, employed Mr. Kuang, the man who testified in
22 this case, against my client.

23 To show you the issue of adversarialness in terms of
24 cases in Court, Mr. Kuang, if you remember, his name was
25 Vincent Kuang, Mr. Kuang started discussions with the

1 Government some years ago.

2 MR. HEEREN: Objection, Your Honor.

3 THE COURT: Hold on one second.

4 Overruled. But ladies and gentlemen, I just want to
5 remind you that these are arguments and the question as to
6 what the evidence shows in terms of the facts is up to you.
7 So obviously, you needn't just accept whatever the parties say
8 to you are the facts, okay.

9 Continue, Mr. Goldberger.

10 MR. GOLDBERGER: If you think that I -- let's be
11 clear, if you think that I say anything to you that's
12 incorrect or that I've on purpose in any way, shape, or form
13 misstated the fact, just disregard it, okay. Just disregard
14 it. I'm going to try not to do that because that doesn't help
15 my client if you think that I'm not telling you truth or if
16 you think that I'm not relating the facts. So let's make sure
17 we understand that.

18 Mr. Kuang testified, and he testified that it was a
19 phone call from Chen in California that both he and my client
20 got well back in 2018. Now, Mr. Kuang then said in further
21 testimony before you, the jury, that what he did was, he
22 remembered that my client wrote those notes, the notes that,
23 one, was put on the door, and two, that were eventually taken
24 down and so forth and so on. And he told the Government
25 prosecutors and the FBI agents right from day one, that's what

1 happened. Those notes were, if you remember, he said
2 something along the lines that they had been in the glove
3 compartment of my client's car, the car that had been driven
4 up to New Jersey. And he continued with the fact to lie,
5 because eventually here in front of you, he eventually said,
6 yeah, you're right, I wrote the notes, all three of them. And
7 how is it that the Government department know he wrote the
8 notes? Because he lied to the prosecutors, all of them
9 sitting here, the best and the brightest that we have. He
10 lied to them. He lied to the FBI agents month after month.
11 Every time he had what they call a proffer session, he went
12 into that session with those agents and those prosecutors and
13 he lied about who wrote the notes. Why would he do that?
14 Because what he was hoping for was a deal, a deal with the
15 Government, and eventually, he got that deal, even in spite of
16 the fact that he lied to them for two years. They still gave
17 him the deal. How is that possible? Because you know when
18 you lie to a federal agent or you lie to a federal prosecutor,
19 that, in and of itself, is a violation of U.S. Code 1001.
20 That's a crime. You can't lie to an FBI agent. You can't lie
21 to an IRS agent. You can't lie to one of these people.
22 Never. You're not allowed to. It's a crime. And yet, he
23 lied time after time, after time. And then eventually,
24 somehow, just before coming in here to court to testify, now
25 he says, you're right, I wrote the notes.

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1 Well, how is it that they didn't know long ago that
2 he wrote the notes? They had experts here about DNA and about
3 fingerprints and about all kinds of things. Could you imagine
4 how many different experts you heard here talking about the
5 various things? How is it that nobody ever once did a
6 handwriting exemplar in terms of Mr. Kuang? Because if you
7 did a handwriting exemplar, you would have known immediately
8 that those were his notes, and not my client's.

9 MR. HEEREN: Objection, your Honor.

10 THE COURT: Overruled.

11 Again, ladies and gentlemen, this is argument.

12 MR. GOLDBERGER: Why is it important? Well, Kuang
13 still has his deal. The deal is still in place. He's got a
14 cooperation agreement with the Government. Even though, even
15 though he lied for, you tell me, year, two years? But they
16 still gave him the cooperation agreement and they're still
17 going to when -- when it comes time for the judge, they're
18 still going to present that cooperation to the judge. What
19 kind of leniency they ask for or they don't, I don't know. I
20 don't think anybody knows at this point. But why do they
21 continue to have an agreement with somebody that lied to them
22 for two years? How do they know he didn't lie other things?
23 It's an adversarial system. You know what they want? They
24 want a conviction. They want a conviction of everybody
25 sitting at that table. That's what they want. And that's not

1 what we want, nor do I think we should get.

2 Now, what's interesting to me is the other day, it
3 wasn't that long ago, you nice people heard a lady named
4 Wheeler who was an FBI agent, part of what they call, the
5 cast, and she talked about the various cell towers and how you
6 get the various information about what telephones were used
7 and where and when and so forth and so on. And so she
8 prepared a document which was referred to in her testimony
9 regarding phones that were mapped in the report. In other
10 words, as it says on a further page, the phones that were
11 believed to be important, are believed to be associated with
12 the conspiracy to act -- this is in evidence, this is an
13 exhibit, so you can take a look at it if you want to -- the
14 target cell phones are believed to be associated with a
15 conspiracy to act as agents of a foreign Government and
16 interstate stalking in 2017 and 2018.

17 There are five phones that are mentioned in that --
18 in this statement. And Vincent Kuang's is one of them. You
19 know whose is not? My client. His phone is not mentioned in
20 those. And the other part of it that's interesting is it says
21 phones not mapped, but referenced in the report, one of those
22 phones belongs to Chen Chaohang. That's the guy in California
23 who made the phone calls who got this from, his point of view,
24 my client's point of view, got this started. So -- and if you
25 remember, there's a document in this exhibit which indicates

1 that there was a phone call at 1:00 o'clock while Kuang and my
2 client were present at that home in New Jersey, and it was
3 with Chen. It was between Kuang and Chen, Kuang and Chen.

4 Now, what did my client know? What did my client
5 know about what was going on? First of all, what you learned
6 about Mr. Chen in California was that he was in the marijuana
7 business, okay, which is what you were told by Mr. Kuang, and
8 that he also had some sort of restaurant business, and that
9 Mr. Kuang knew him pretty well because he paid Mr. Kuang
10 \$3,000 a month to watch the marijuana store. Okay. My client
11 didn't work for him. There's no evidence of that whatsoever.
12 What there is evidence of is my client driving up to New
13 Jersey with Kuang, okay, and we will discuss that at length
14 because that's what their case is about.

15 Now, I just want all of you jurors to, when you
16 examine each witness and you examine each piece of evidence, I
17 just want you to do it with a fair and open mind, okay.
18 Mr. Kuang is a liar. He has been a liar in terms of the
19 Government for two years. He wrote the notes. He's the one
20 who went there.

21 Now, let's go through what happened up in New Jersey
22 because that's important. Up until -- well, let's go back for
23 one second. I'm sorry. What is it that Chen -- and by the
24 way, the most important witness that I'm sure the judge will
25 tell you in her charge -- Judge Chen will tell you that both

1 sides have the ability to subpoena witnesses. There's no
2 question. Both sides had the ability to subpoena witnesses.
3 However, there's a huge difference. The burden of proof in
4 this case and in every criminal case in America is only on one
5 side, right here. We have no burden, whatsoever. The judge
6 will tell you that in her charge. We have no burden
7 whatsoever to call a witness, to do anything. We can sit
8 there. I don't even have to stand up here and talk to you at
9 the end of it and still say to you, find my client not guilty.
10 So they have the burden of proof.

11 Let me ask you a question that I want you to ask
12 yourselves: If there was a witness in this case that you
13 would like to hear what his conversations were with Chen or
14 supposedly with my client -- with Kuang, excuse me, wouldn't
15 it be Chen?

16 MR. HEEREN: Objection, your Honor.

17 THE COURT: Sustained. Sustained. Careful.

18 Again, ladies and gentlemen, as I'll remind you
19 during my instructions, I want to you to focus on evidence
20 before you, not anything that isn't before you.

21 MR. GOLDBERGER: I'll repeat, we have no burden of
22 proof. They have the burden of proof. They have to convince
23 you beyond a reasonable doubt. Okay. So let's go back.

24 There's a phone call -- this is in September of
25 2018, September -- the phone call from Chen was either

1 September 3rd or September 4th. He has phone calls with both
2 my client and with Mr. Kuang. And what he asks -- and this is
3 why it's really really important, because there are two
4 counts, the first two counts in this indictment that you're
5 going to have to deliberate on that are answered immediately
6 for those conversations, okay. And that is, are you working
7 for the Chinese Government? And the answer is, what does Chen
8 tell either Kuang or my client in those conversations? What
9 does he tell him?

10 Do you remember what Kuang said? The Government
11 says, now he as a truth teller. So we can now believe him.
12 He says, it's a dai lo. Remember the expression, a dai lo
13 that wants this done. He wants this person threatened in some
14 way, shape, or form or informed in some way, shape, or form.
15 That person is supposed to be a dai lo. A dai lo is a
16 gangster. A dai lo is a person who is part of a triad. It's
17 not the Government. Clearly not the Government. So that's
18 what Mr. Kuang and supposedly my client know when they
19 determined to go up to New Jersey, that they're doing this as
20 a favor to Chen, no money, ever, ever, ever passes hands.
21 Nothing. Zero. Okay. And maybe for Kuang that's
22 understandable, he works for the guy he watches his marijuana
23 and so forth and so on. My client doesn't work for him. It's
24 a favor. He's going to drive Mr. Kuang up to New Jersey.

25 Ask yourselves the question then, why for two years,

1 does Kuang continue to say that my client wrote the notes?
2 Why does he tell the Government that? He wants, what? He
3 doesn't want the responsibility of what the notes say? He
4 doesn't want the responsibility that he's going to be under
5 more severe pressure from the Government? Well, I'll tell you
6 why the Government shows you why Counts One and Two have no
7 bearing in terms of either Kuang or my client. They let Kuang
8 plead guilty to the interstate stalking or the conspiracy to
9 stalk interstate. He didn't plead guilty to either one of the
10 counts that dealt with working for China. Neither of them.
11 That's after lying to them for almost two years. How is that?
12 How is that possible? If he was working for China or he
13 thought he was working for China, why wouldn't the Government
14 at that point since he's -- now they found out that he's been
15 lying to them for two years, why wouldn't they finally say to
16 him, you know what, you're going to have to plead guilty to
17 this whole indictment? Because he couldn't because he wasn't
18 working for China, in his mind. He didn't know anything about
19 working for China. What he knew about was, I'm being asked a
20 favor to go up there and do what I'm supposed to do, which is,
21 you know, put some kind of note there. So he finally admits
22 that he goes home and he writes three notes. They're
23 evidently carbon copies of each other.

24 So let's talk for a second about the notes. There
25 is no question, I think, that the evidence if you look at it

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1 fairly and carefully, that my client probably or certainly or
2 most likely knew what was in those notes, even though he
3 didn't write it. There were three notes put on the door. My
4 client had the tape dispenser, put tape on the door. You saw
5 the videotape, they knocked on the door. There was no
6 pounding on the door, there was no yelling, there was no
7 screaming, there was no threats made. Review the video again
8 if you want to. They did go around to the back of the house.
9 At some point, you did hear my client say, I don't think
10 anybody's been here in a long time. So he's clearly there,
11 and I think it's a fair assumption on your part that he
12 probably did know for sure what was in those notes, what was
13 in that note. I think that's a reasonable assumption for a
14 jury to make, even though he didn't write them and even though
15 Government was told that he did write them, that it wasn't
16 Kuang.

17 So what happens? If you remember, there's a phone
18 call and that may have been the phone call at 1:00 o'clock
19 between Kuang and Chen that you saw the FBI agent who was
20 doing the cell phone towers talk about. And then the two of
21 the notes are taken down. There were three notes. Two of the
22 notes are taken down. And you can see, play the video again
23 if you want to. You see the two notes are being taken down,
24 and it appears that my client crumples one or both of the
25 notes, and just throws them in the dirt around the property.

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1 Not exactly a great criminal. I mean, you know, if you want
2 to take the notes, you take them with you, you put them in
3 your pocket and then you burn them. You don't throw them on
4 the same property. But be that as it may. So now the note,
5 there's still one note on the door.

6 But what happens? What happens? There's no further
7 contact that the Government is aware of that it shows to you
8 between Chen and my client or Kuang and my client. They drive
9 back to Brooklyn where Kuang lives, Kuang is deposited at
10 home, my client drives off somewhere. But what happens the
11 next day? What happens the next day is that my client goes
12 back, he goes back to the property by himself. It's on video.
13 Please replay it. Replay it, because I think it's important.
14 Because this deals with the question of interstate stalking
15 and the case itself. He goes back and what he's trying to
16 do -- and it's pretty clear. He walks up to the door, okay,
17 and you sort of lose sight of him for a second, but he's at
18 the door. Now, it appears probably that the lady of the house
19 has already taken the note down, put it in that bag, and saved
20 it for the FBI. So he's at the door for only a few seconds,
21 and then he turns around, and you'll see him, and he walks
22 away, and he's walking back to his car and he drives away.

23 What he's doing is he's trying to get the last note
24 out of there. He's trying, without legally, technically think
25 about it, what he's trying to do is he's trying to withdraw

1 from what he did before. He knows what he did the day before
2 is wrong. He's trying to make it write by, let's get the last
3 note. He thinks two notes are already gone. Let me get the
4 last note, and there are no notes anymore. He didn't think
5 anybody was home. They walked around the house. So he's
6 trying to do the right thing. He does not want to commit a
7 crime. He wants to withdraw from this so-called conspiracy.

8 Is there any other thing that you could think of as
9 to why he would go back there on his own? Kuang didn't know
10 he went back. He didn't testify to it. And there's no
11 information in the record that Chen and my client had any
12 further conversations. So why is he going back? He's going
13 back to take down the last night and try to make it right.
14 It's like, you can't just -- and the judge will charge on
15 this -- you can't just think to yourself, well, I did
16 something wrong yesterday, okay, it's over, I'm sorry I did
17 it, good bye. No, you've got to do something to try to show
18 people or to make it right, so to speak. So he goes back.
19 It's only thing he can do because there's one note left, at
20 least that's what he thought, because remember, the other two
21 notes had been taken down.

22 There is no evidence, none, zero, that he had any
23 other involvement whatsoever with Mr. Zhu and his family, the
24 so-called victims in the case. None. Zero. There's no
25 evidence that he did anything else with anybody, at any time.

1 Now, some of you may be saying -- and I'm trying not
2 to read minds -- but some of you may say, well, how do we know
3 for sure that that's what he was doing when he went whack,
4 that he was trying to get that last note down because he knows
5 that it had been wrong. But you don't know for sure. No one
6 knows for sure. The only one who knows for sure is him.

7 How long was he involved in this supposedly probable
8 scheme? Twenty hours? Twenty hours? The call with Chen was
9 the night before or the late afternoon before. Chen's in
10 California, three hours earlier, and he talks to -- and he
11 picks up Kuang, because Kuang doesn't have a car. So he
12 drives Kuang, who's got the notes, up to New Jersey. And by
13 the way, if you remember from the testimony, got lost. He
14 didn't know where the place was. He had no idea about this
15 guy, who he was, Mr. Zhu. He didn't know anything about him.
16 Whether he was the worse guy in the history of China or
17 whether he was a terrific guy. He didn't know anything about
18 him at all. And there's no proof in the record that he did.
19 Nothing.

20 And by the way, why is he doing this? Is there
21 anything in the record? Is there any evidence that he got any
22 money or anything for it? No. Nothing. Is there anything
23 that took place from that day on, from September 4th of 2018,
24 that's what we're talking about now, that's four, five years?
25 Is there anything that you've heard that says this guy is

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1 involved in terrible things, and he's a menace, and he needs
2 to be prosecuted and he needs to be put away? Take a look at
3 him. Don't be ashamed to take a look at the defendant. He's
4 a kid. He's a young man. Was it stupid to do what he did?
5 You bet. Was it a crime? Initially it started to be a crime
6 until he went back and he withdrew from the conspiracy.

7
8 (Continued on the following page.)
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1 (Continuing.)

2 MR. GOLDBERGER: You're going to have to decide for
3 yourselves whether or not there is sufficient evidence to
4 believe that when he went back on his own without telling
5 anybody and went up to the door, that that was what he had in
6 mind.

7 Now, Judge Chen is going to charge you on the law
8 probably tomorrow, my guess is, or maybe late this afternoon,
9 I don't know. You really need, you really, really need to
10 listen to her carefully. The law is really, really -- I mean,
11 I'm not just saying this. It's really important that you
12 understand the principles involved. Okay? And there are some
13 principles that are somewhat difficult maybe to fully
14 understand and there are others that will come like natural to
15 you; you'll just feel it. But there is a substantial
16 difference between proof beyond a reasonable doubt, which the
17 Judge will talk to you about, and proof in a civil case, which
18 is a little more than 50 percent on one side than the other.
19 Okay? I mean, you may have read stuff about civil cases
20 because our Former President has been involved in some here in
21 New York and some other places. So we're not getting into
22 politics, but the bottom line is, it's really important to
23 listen to the Judge.

24 Now, there's another area that we need to talk
25 about. There's a part of the Judge's charge which is really

1 important for you to listen to carefully, and that deals with
2 the question of whether or not there are multiple conspiracies
3 in the same indictment. She's going to give you the
4 instructions on the law. Because if there are more than one
5 conspiracy to find in the indictment, then the jury must
6 acquit even if they believe certain crimes were committed.
7 There can't be -- you can't try two or three conspiracies
8 before one jury. You can't do that. You can only try one.
9 So if you believe that there are two separate conspiracies in
10 this case, which I think there is substantial evidence of, you
11 listen to the Judge's charge. It probably should be the first
12 thing or one of the first things, my suggestion to you, for
13 you to wrestle with. Because there's clearly one set of
14 circumstances that deal with what happened with Mr. Xu and his
15 family and so forth and so on, and then there's another set of
16 circumstances that deal with some of the other people that are
17 involved and what they were doing. There is no evidence in
18 this case as to why Mr. Chen asked the favor, go up there,
19 leave a note. It's for gangsters and whatever, and so forth
20 and so on. So it's not as simple as it looks.

21 In addition to which, one has to wonder. I'm just
22 asking the question out loud. You know, whether you end up
23 thinking I'm a jerk or I'm a bad guy or whatever, it doesn't
24 matter a bit. I've been doing this forever. And it's
25 important, it's important more for him than for me. Okay?

1 It's serious business. Because when you lose in a criminal
2 case and a jury says you're guilty, it has huge repercussions
3 on your life. So you have to -- we picked you because we
4 believed you would take it seriously. And I think you have.
5 I think you've paid attention, all of you. Every one of you.
6 You know, it's like a big fish bowl here; we look at you, you
7 look over at us. Maybe sometimes we don't look so smart, we
8 don't look so good, but we're looking. And what we're looking
9 at is: Are they listening? Are they into it? Do they care?
10 And we think you do. We think you do. Not every jury does;
11 those are bad picks. We've been through that. But we think
12 you're going to give this a fair shake.

13 So I think that you have to come back to how it --
14 you know, I mean, in terms of the adversarial system, why is
15 it, why is it that the government is willing to lean over not
16 backwards, but almost in tumblesaults to give Kuang -- keep
17 him with his deal after he lies to them for two years? These
18 are the people he lied to, right here. Mr. Heeren, he's -- I
19 guess he's the chief prosecutor in this case right now. He's
20 sitting at the end of the table, so we'll give him credit for
21 being chief prosecutor. And then there's the rest of them.
22 They're all smart. Every one of them is smart as a whip, no
23 question. I have lived long enough to know who is smart and
24 who is not, and they're smart. But they got lied to. They
25 got lied to. And you know what? They bought into the lies of

1 Kuang.

2 You know, if Kuang had told the truth from the
3 beginning -- think about this for a second. Suppose he told
4 them from the beginning: You know what? He didn't write the
5 notes; I wrote the notes. I'm the one who was really involved
6 with the notes. I'm the one who spoke to Chen, really. And I
7 knew what Chen wanted in the notes, that's why I wrote the
8 notes and that's why I put what it is.

9 Would they have acted the same in regard --

10 MR. HEEREN: Objection, Your Honor.

11 THE COURT: Overruled.

12 Hold on one second.

13 I'm sorry, I'm trying to figure out what was said.

14 "I'm the one who spoke to Chen," meaning what your
15 client said.

16 All right. Sorry. I'm going to overrule the
17 objection.

18 Remember, ladies and gentlemen, it's argument.

19 But I do think you are starting to repeat yourself a
20 bit, Mr. Goldberger, so I think you should wrap this up.

21 MR. GOLDBERGER: Very well, Your Honor.

22 One of the other things that you've learned in this
23 courtroom in the last two weeks you've been here is there's
24 only one boss, and that's rightfully so. In terms of deciding
25 what the law is in the case, Judge Chen is the last word. You

1 listen to every word that comes out of her mouth, whether it's
2 tomorrow or the day after, whenever it is, in terms of how you
3 apply the law to the facts of the case. Okay? Because you
4 have to. You have to all understand and agree that you will
5 follow what she says on the law. Okay?

6 But on the facts, with all due respect, I don't care
7 what she thinks, I don't care what they think. The only thing
8 what matters is what you think about the facts. This kid went
9 back there the next day, take that note down. There's nothing
10 about this kid being a criminal, nothing anywhere. Chen,
11 Chen, Chen. Where is he? Why isn't he here.

12 MR. HEEREN: Objection, Your Honor.

13 THE COURT: Sustained.

14 But I think Mr. Goldberger is done.

15 I will give you instructions, ladies and gentlemen,
16 on how to consider amongst -- you don't consider the fact that
17 some individual was not on trial before you and did not
18 testify. Those will be my instructions. And as
19 Mr. Goldberger said, you should follow those.

20 MR. GOLDBERGER: All right. I will wrap up, ladies
21 and gentlemen, because probably enough is enough and you've
22 got one more lawyer to listen to.

23 So I would like to finish by saying to you that when
24 you go to deliberate with each other, be as respectful to each
25 other as you would hope people would be to you. Have a

1 reasonable discussion.

2 Some of the ideas that have been thrown out by me,
3 for instance, in regard to my client, I think are things that
4 you should be considering. And most importantly of all is
5 that there is zero evidence -- you can ask to have anything
6 read back you want, you can get any exhibits you want, there
7 is zero evidence that my client knew or thought that he was
8 acting on behalf of the Chinese government. There is no
9 evidence. So Counts One and Two, that's what that is.

10 From my point of view, the only count that you
11 really have to be concerned about with my client is the
12 question of the interstate stalking. When he went back the
13 next day, was he trying to take that note down because it was
14 wrong or was it for some other reason? By the way, if you
15 want, play the tape back again. There was no banging on the
16 doors, which is what somebody said, knock-knock.

17 Thank you for listening. I wish you all good luck.
18 Not easy being a jury. Thanks again.

19 THE COURT: Thank you, Mr. Goldberger.

20 Let me just turn to the jury. I would like to
21 proceed with the next closing, unless someone needs a break?

22 Okay.

23 All right. So, Mr. Tung, your summation, please.

24 MR. TUNG: Hello? Hello?

25 THE COURT: Yes, go ahead.

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1 MR. TUNG: Okay. Thank you.

2 Good afternoon, everybody.

3 THE JURY: Good afternoon.

4 MR. TUNG: Ladies and gentlemen of the jury,
5 actually, the government of the United States have won this
6 case. The reason I'm saying this is, at least two of the
7 defendants have pleaded guilty.

8 MR. HEEREN: Objection, Your Honor.

9 THE COURT: Overruled. Overruled. Overruled.

10 MR. TUNG: It's a fact.

11 THE COURT: Let's just go on, Mr. Tung.

12 Okay, go ahead.

13 MR. TUNG: You have heard --

14 THE COURT: Sorry, maybe be clear. You're not
15 talking about the defendant sitting here, obviously?

16 Okay, go ahead.

17 MR. TUNG: You have heard government witness
18 Jin Hongru, or Allen Jin, testify. He testified that he had
19 pleaded guilty to the charge of acting as an agent of a
20 foreign government without prior notifications to Attorney
21 General. And you have also heard a government witness Kuang
22 Zebin, or Vincent Kuang. He also testified that he had
23 pleaded guilty to the charge of engaging in interstate
24 stalking. So the government has won the case already.

25 Now, the question that is before you today is to

1 determine whether or not the three defendants sitting here are
2 knowingly, knowingly -- I emphasize "knowingly" -- committed a
3 crime or they had been unknowingly used, used by a foreign
4 government to carry out its mission.

5 Counsels for the Defendant McMahon and the Defendant
6 Zheng just made their closing argument on behalf of their
7 clients. And I am now speaking to you on behalf of my client,
8 Yong Zhu.

9 Now, as you have seen for the past few days, I'm
10 kind of the old dog learning a new trick. I do not know how
11 to play with the technology. And the government doesn't want
12 to assist me, so fine. So I have to utilize this old
13 projector here.

14 THE COURT: I do have to correct the record. They
15 actually did assist you a number times, but I think it's
16 beside the point.

17 But go ahead.

18 MR. TUNG: Well, Your Honor, not for today. They
19 refused.

20 THE COURT: Oh, I see, for your closing.

21 Okay, go ahead.

22 MR. TUNG: So bear with me. Sometimes I have to go
23 over there to play the exhibit.

24 Okay. Ladies and gentlemen, I also like to bring
25 your attention to the fact that my client, Yong Zhu, did not

1 take the stand to testify to clear up his name. And you will
2 hear -- Judge Chen will instruct you that you should not draw
3 any negative or adverse inference against my client, Yong Zhu,
4 because he did not take the stand to testify. In our criminal
5 justice system, a defendant is never required to take the
6 stand to prove his innocence.

7 As you all know by now, Yong Zhu has been charged
8 with committing a crime of conspiracy to act as an agent of a
9 foreign government without prior notifications to Attorney
10 General and to engage in interstate stalking.

11 The very first thing I would like to remind you is,
12 remember, government called a witness, Professor Wedeman, I
13 believe, if I don't remember wrong his name. And he
14 confirmed, I think when I asked, not every Chinese is a member
15 of the Chinese Communist Party. And he also explained the
16 government structure in China. In China, he discussed the
17 structure of the government. And he also stated that the
18 Chinese Communist Party is a monopoly, the controlling party
19 of the Chinese government. So essentially, what Professor
20 says is Chinese government is controlled by the Chinese
21 Communist Party. And since Mr. Yong Zhu, even though he has a
22 green card here, but he's still not a citizen, so he still can
23 be considered as someone with Chinese origin. But we cannot
24 assume that everyone who is Chinese origin, such as Yong Zhu,
25 is automatically an agent of Chinese government. We've still

1 got to look at the evidence and see if he actually acted as an
2 agent for the Chinese government.

3 I ask you to pay close attention to Judge's
4 instruction regarding the law pertaining to acting as an agent
5 of a foreign government. It is important to understand that
6 according to the law, the government bears the burden, with
7 all responsibility, of presenting evidence beyond a reasonable
8 doubt that the defendant, Yong Zhu, knowingly, knowingly acted
9 as an agent for the government or an official of China,
10 Chinese government, while residing in the United States. To
11 meet this burden, the government must prove beyond a
12 reasonable doubt that the defendant was fully aware that his
13 actions were carried out under the direct control or direction
14 of the Chinese government in light of the evidence presented
15 during the trial. I submit to you that the government has
16 failed to satisfy its burden of proof in demonstrating that
17 Yong Zhu knowingly acted as an agent for the Chinese
18 government.

19 Now, we have heard enough about this story and, as
20 you should know, that upon Yong Zhu's return to the
21 United States back in 2016, his involvement began when he
22 agreed to assist someone in China who requested help to locate
23 an individual in the United States who owed a private debt.
24 Yong Zhu's action led him to contact an attorney, Laping Shi.
25 And you'll remember she took the stand and she was -- and she

1 came here to give testimony pursuant to a subpoena because our
2 office subpoenaed her. It was not because she is a friend of
3 Yong Zhu. As you have heard her testimony, Yong, when she --
4 when he met with the attorney, he never mentioned to the
5 Attorney Shi that he was acting upon the request of a Chinese
6 government official to look for someone for the Chinese
7 government. Instead, he explicitly stated to the attorney
8 that he was approached by someone in China to help them to
9 locate an individual who owed money to that person.

10 Now, you also notice that the Attorney Shi told him
11 that she by herself did not do those kind of work. But she's
12 an attorney, she said this is common practice to locate
13 someone, such as to locate defendant's assets, so she's saying
14 she probably knows someone and she actually going through
15 another attorney to find the detective, Private Investigator
16 McMahon here.

17 And Shi, the attorney, prepare a retainer agreement
18 that you have seen yesterday. Let me display it again today
19 so that can remain -- refresh your memory.

20 Can I get help from you?

21 THE COURT: Yes.

22 You are going to use the ELMO, right?

23 Okay. This is exhibit?

24 MR. TUNG: This is Defendants' Exhibit A, Yong Zhu
25 A.

1 Now, this first thing is the cover letter, cover
2 e-mail. What I like to point out now from this e-mail is,
3 remember this morning the government said Yong Zhu sent the
4 retainer to a person in China by the name of Hui Sun who is a
5 government official and he has e-mail address 19960165@qq.com?
6 What the government tried to imply, or maybe they will say
7 this is direct evidence, that Yong Zhu should know he has
8 been talking to government official. But, ladies and
9 gentlemen, looking at this e-mail address alone, qq.com e-mail
10 is just like Yahoo, Gmail.com in the United States. That is
11 not an official government address such as in this country,
12 such as you end up with dot-organization, dot-gov. From this
13 e-mail, from this e-mail address alone, there is no way for
14 Mr. Yong Zhu to figure out this person is a government
15 official. So this is something I just want to clarify for
16 you.

17 The real purpose for me to show this retainer
18 agreement still, I'm -- I mean, bear with me. I know I went
19 through this yesterday, but I still want to point it out and
20 when you have the evidence in front of you. Looking at the
21 scope of the service, it was very clear. He was asked to act
22 as client's family counsel in assisting client to handle the
23 matter involving a licensed private investigator in locating a
24 male subject whose name is, blank, including subject's
25 whereabouts, photos, videos. There's nothing in this retainer

1 agreement that refers or made any references to the work is
2 being done is asking -- is asked by a Chinese government
3 official or the Chinese government.

4 Now, ladies and gentlemen, you remember during the
5 trial, the government has demonstrated in other defendants and
6 they have done also communications there, what they -- that
7 very impressed me because I'm not a technical person, as you
8 can see today, when they talked about, you know, how to
9 extract data from iCloud. Those are very sophisticated
10 technologies they have now. They can look -- they can take
11 our e-mail address and they can match with -- you know, with
12 the data they retrieve from Immigration or Homeland Security
13 or et cetera. And all these people, all those experts come
14 in. And I remember the government spend a day to work on
15 these things to demonstrate how they can prove the people --
16 there's no picture here now. They removed. That's fine, is
17 enough for me. Okay? Those pictures of government officials,
18 Chinese government officials, takes them so much time, but
19 they can't -- they do have the technology to identify them and
20 they can extract the data, and the expert testified they can
21 convert those data to something that's readable by normal
22 people. But, ladies and gentlemen, I'm asking you for one
23 thing: Have you seen any evidence such as text messages,
24 e-mails or other communications that clearly -- not only
25 clear, that states Mr. Yong Zhu was communicating with the

1 Chinese official at the outset when he took the -- I mean,
2 when he promised -- when he agreed to help someone to locate
3 someone in the United States? Have you seen any of those
4 evidence here? None. None that you can find.

5 The point I was making is, if the government can
6 locate any such a text message or e-mail messages,
7 communication indicating when that person in China asking my
8 client, Yong Zhu, to do the job, to locate person by Chinese
9 government, they are able to do so, but they -- if it's not
10 here, that means they cannot locate him or they do not even
11 exist.

12 MR. HEEREN: Objection, Your Honor.

13 THE COURT: Sustained.

14 Be careful, Mr. Tung.

15 Ladies and gentlemen, you're not to speculate about
16 evidence that's not before you or individuals you have not
17 heard from, as I will tell you again during the instructions.

18 MR. TUNG: Now, on the other hand, you can see that
19 my client, Yong Zhu, when he got the -- when he got people
20 asking him, you know, in China asking him to do a job to
21 locate person, he wanted to make sure that what he was doing
22 was legal or legitimate. So he went to see an attorney
23 instead of going to just, you know, somewhere else. And plus,
24 you know, he does not speak English. He wanted to make sure
25 that what he does was not violating any laws. That was the

1 purpose he went to see an attorney. And the attorney didn't
2 advise him what he was doing or what he was helping the people
3 in China to look for someone here is illegal.

4 MR. HEEREN: Objection, Your Honor.

5 THE COURT: Sustained.

6 Again, just, Mr. Tung, please try to stick to the
7 evidence as opposed to what didn't happen or they didn't hear
8 about. Remember? Focus on the evidence in the trial.

9 MR. TUNG: Well, this is an argument, Your Honor.
10 Because why people looking for an attorney?

11 THE COURT: No, Mr. Tung, don't argue with me. Just
12 continue. Just be careful. Focus on the evidence and what
13 you would say is perhaps the insufficiency of that evidence or
14 what it shows or doesn't show.

15 MR. TUNG: And for whatever the reason, we do not
16 know. It's up to the government to present why -- there is a
17 reason -- I mean, whatever the reason, we do not know. Yong
18 Zhu did not sign this retainer agreement. But Mr. Yong Zhu
19 found an interpreter, Chinese interpreter, to assist him to
20 communicate with the Private Detective McMahon that was
21 located for him by Attorney Shi.

22 I would like to show you Government's
23 Exhibit 0901-D, and I put up there.

24 Now, when you have a chance to go back to the room
25 to deliberate, please take a look at this document, this

1 document, Government's Exhibit 0901-D. It is a WeChat
2 communications, right? It's a WeChat communications between,
3 by the name of Wang Xin Middleman and I believe the other
4 person is the interpreter.

5 Ladies and gentlemen, please take note, look at it,
6 the e-mail of the WeChat communications. Yong Zhu, in this
7 WeChat communication, and he used an alias name, Wang Xin, the
8 middleman. Now, most people when they sign on WeChat, they
9 will use an alias names instead of using their real names.
10 Most people would do that.

11 THE COURT: Sustained.

12 Stick to the evidence.

13 MR. TUNG: Now, look at this. He, Mr. Yong Zhu, is
14 calling himself a middleman. What is a middleman? Middleman
15 is someone who introduce someone to somebody else. He's in
16 the middle. That's what a middleman. Doing the business
17 transaction, he introduce Party A to Party B and he's acting
18 as a middleman. That's what Yong Zhu is talking about. I
19 mean, he's defining his role in this transaction.

20 Now, if you go through all of those WeChat
21 communications, you will notice there's none, no
22 communications and no mentioning of Chinese government at all.
23 The job they're talking about between try to get the -- try to
24 nail down the contract, the retainer agreement between McMahon
25 and Yong Zhu are his Chinese contacts. If you go -- I don't

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1 want to go through because of time. It's up. But if you go
2 through this exhibit. And the other person, interpreter
3 service is also, you notice from other displays, other
4 communications, is called Transperfect Languages Service.

5 I'm going to show you another government's exhibit,
6 3009.

7 THE COURT: Is that admitted?

8 Hold on.

9 MR. HEEREN: Your Honor, can we just take down this
10 version? It's unredacted.

11 THE COURTROOM DEPUTY: It's off.

12 THE COURT: So is there a redacted version that
13 someone can provide to Mr. Tung?

14 MR. HEEREN: Yes, we can.

15 THE COURT: Okay.

16 MR. HEEREN: What number, Mr. Tung?

17 MR. TUNG: 3009.

18 THE COURT: Do you just want to put it on the
19 screen?

20 MR. HEEREN: We're ready, Your Honor.

21 THE COURT: All right. Thank you very much,
22 Government.

23 THE COURTROOM DEPUTY: Do you have your double
24 screen on?

25 Oh, there you go.

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1 MR. HEEREN: One second. She's fixing it.

2 (Pause in proceedings.)

3 THE COURTROOM DEPUTY: Good?

4 MR. HEEREN: Yes. Thank you.

5 MR. TUNG: That is the retainer agreement signed
6 between Yong Zhu and Detective McMahon. All I pointed out to
7 you, if when you go back to the deliberations room, there's no
8 mentioning whatsoever that work was being asked by the Chinese
9 government. And the reason Mr. Yong Zhu signed these
10 retainers on behalf of his Chinese contact, it could be the
11 Chinese contact in China, when you have a retainer, you cannot
12 sign physically.

13 MR. HEEREN: Objection, Your Honor.

14 THE COURT: Overruled.

15 Again, this is argument. You're asking them to make
16 that inference.

17 Go ahead.

18 MR. TUNG: Now I am going to show you Government
19 Exhibit 3007.

20

21 (Continued on the next page.)

22

23

24

25

1 MR. TUNG: (Continuing.) This exhibit shows the
2 communication between Emily Hsu. Emily Hsu is also known as
3 Lina Xu, and she was the interpreter and she was hired by
4 Yong Zhu to assist him to communicate with Mike McMahon.

5 Now, on the last page of this email, and that is
6 Government Exhibit 307, on the last page of this email, there
7 was an email sent by Detective McMahon and asking for the
8 information, the name of the person, the subject target, phone
9 number, etc., and --

10 THE COURT: It wasn't focused, Mr. Tung, in and out
11 of focus. Just give it a second. There you go.

12 Now, ladies and gentlemen, if a detective or private
13 investigator was hired to do the job to locate someone, what
14 are the normal information he would like to get, a person's
15 name, address, or something, whatever the information you have
16 that might help him to start look, and there's nothing wrong
17 with this. It's normal business between McMahon and Yong Zhu
18 at that time.

19 So -- and I'm going to show you the exhibit --

20 MR. HEERAN: Your Honor, that's un-redacted, as
21 well.

22 MR. TUNG: 3013.

23 Ladies and gentlemen, this is the information that
24 Yong Zhu through his interpreter provided to private
25 investigator McMahon so he can start to work on the job. Now,

1 you know that Ms. Yong Zhu does not speak English so data
2 compiled here is most likely done by Emily Hsu and she was
3 working for Yong Zhu. What the government says that's where
4 Ms. Yong Zhu's involvement as part of this conspiracy, right,
5 provides the information to the Detective McMahon.

6 Ms. Yong Zhu here -- Mr. Yong Zhu here is actually
7 getting the information from his China contact, Chinese
8 contact and passing along to Detective McMahon. Now, remember
9 I showed you before in the reach of communication, in
10 Yong Zhu's mind, he is -- he was the middleman. So most the
11 time, as the middleman, you'll understand, in the business, in
12 any business transactions, you're the one to let your party B
13 to know who party A is. Otherwise, what is your -- what's the
14 point of being a middleman. They will cut you off, right?
15 They'll deal directly with each other.

16 So as a middleman, that's the only reason
17 Mr. Yong Zhu still communicate with Mike McMahon to give him
18 the information and pass it on, the feedback, you know, from
19 McMahon, what the Chinese contact wants. That's how -- those
20 communications between October 5 and October 27, 2016 for that
21 period of time. At the very beginning period of time, you'll
22 see these in the evidence, they have been communicating,
23 communicating with each other.

24 Of course, now, the middleman, he wanted to get
25 paid. If they know each other, he not going to get paid and

1 you have seen now he was cut out after he introduced Eric Yan,
2 Hu Ji, a -- later, we know that he's a Chinese contact,
3 official from China, to Detective McMahon as when they falsely
4 met at Panera Bread restaurant in New Jersey. That was the
5 point in time he was cut out, and I'm going to show you the
6 picture, the famous picture of three, that's
7 Government Exhibit 0902-F. And you have seen this famous
8 picture many, many times, but my argument for my crime is
9 was -- is after this date, after they met, there was no more
10 communications between Yong Zhu and -- at the very beginning
11 shortly thereafter, sporadic communications, but then that
12 decreases, as I will show you now in the next exhibit.

13 The next exhibit is Government Exhibit 0316. In the
14 left upper corner, these are the -- this is a voice call
15 analysis produced by the government and they had an expert, a
16 lady who testified what the communication is -- was. Now, the
17 summary charts recorded phone calls from September 2016
18 through December 2016. If you look at these, Yong Zhu's
19 involvement -- okay, there are still some communications --
20 the first one, I found Yong Zhu on that list that call between
21 Yong Zhu and Hu Ji, that's on October 26, 2016, that's a day
22 before the three men met at the Panera Bread restaurant, and
23 the next time is October 27, 2016, Yong Zhu and Hu Ji talked
24 on that date for about 15 minutes. The two calls added
25 together.

1 Going through. On October 27, 2016, that's the day
2 where the three met at the restaurant, Hu Ji and Yong Zhu had
3 a communication. And then the next one I can identify on this
4 table is October 28, 2016, Hu Ji and Yong Zhu had about
5 point-three seconds communication. I do not know what it is,
6 it could be a messaging. And thereafter, you'll see this --
7 throughout this, the rest of the entries which ended on
8 December 29, 2016, no communications between Hu Ji and
9 Yong Zhu. So, clearly, after the three met in the restaurant,
10 Yong Zhu was terminated or eliminated.

11 So -- now, I'm going to show you the next exhibit
12 which is Government Exhibit 0317. Now, this is a continuation
13 of a voice call, monitoring voice call for the data -- for the
14 period April 5, 2017, through April 12, 2017, and you noticed
15 on the left corner, Yong Zhu is not even the number listed
16 there to be monitored. And if you go through all those six
17 pages, there's no phone calls from anybody, from anybody, to
18 Yong Zhu or Yong Zhu called anyone else on this chart.

19 April 5th through 12th, that's where people from
20 China, Liu Yan and his -- and her crew from China came over to
21 the United States before they left the United States. So this
22 clearly indicates in April 2017, Yong Zhu, at that time, was
23 already out of this circle, he had no business, whatsoever,
24 with him.

25 And that's why I would call this date the date they

1 met. October 27, 2016, is the date for them to get rid of
2 Yong Zhu. Now -- so, in other words, Yong Zhu's involvement
3 was only started from October 5th through October 27, 2016, at
4 very beginning, at the outset, and he helped the Chinese
5 contact to find, through the attorney, to find the detective
6 Michael McMahon and then he kind of signed a retainer
7 agreement on behalf of the Chinese contact. He didn't pay the
8 money. The money was paid -- I mean paid by -- that money was
9 paid -- somebody is paying the detective and the interpreter.
10 Now, then his service was terminated.

11 What he did, you have heard, you have seen some of
12 the evidence, what he did was he went to the airport to pick
13 up Eric Yan, or Hu Ji. He provided -- no, before they meet,
14 right, he provided service to drive them from the airport to
15 hotel and driving around for three days and he was compensated
16 \$600 -- \$200 a day for providing transportation service.

17 Remember the government showed post-arrest video
18 recording of Yong Zhu when he was interviewed by FBI agents in
19 a small room, and I am not -- I know the government will say
20 objection, but I say, before they say objection, I'm not
21 trying to -- trying to make a point that he was not given
22 Miranda rights until --

23 MR. HEERAN: Objection, Your Honor.

24 THE COURT: Sustained. If I sustain the objection,
25 you can't go into that again, remember?

1 MR. TUNG: I know, Your Honor. That's why -- let me
2 finish. That's not where I'm going.

3 What I'm going to say is the fact is Ms. Yong Zhu
4 gave an answer to a question posed by the FBI agent without
5 guidance of an attorney in the room. That is a fact. That's
6 not -- I'm not -- I know I'm going to go that direction. I
7 know that. What I'm trying to make a point to you is, let me
8 post this exhibit, Government's exhibit, so you'll see what
9 I'm talking about here.

10 THE COURT: And what's the number?

11 MR. TUNG: This is the transcript of the recording,
12 703-D.

13 THE COURT: This is 703-D. Is that in evidence?

14 MR. TUNG: It is in evidence.

15 THE COURT: Okay. And is there a page in particular
16 you're focusing on?

17 MR. TUNG: Yes, it's the last page.

18 THE COURT: Okay. We just want to make sure there's
19 nothing in it that shouldn't be public.

20 MR. TUNG: That's the recording they played, the
21 government played.

22 THE COURT: You want to play the recording?

23 MR. TUNG: No, I don't want to play the recording --

24 THE COURT: I just want to confirm with the
25 government that there's nothing in 703-D that we shouldn't

1 publish right now?

2 MR. HEERAN: No, Your Honor. Just for
3 clarification, we have no objection to this but the transcript
4 is a demonstrative, but we have no objection to him showing
5 it.

6 THE COURT: Go ahead.

7 And, ladies and gentlemen, again, a demonstrative is
8 not evidence so it won't go back into the jury room with you.

9 MR. TUNG: I will let the jury know if they want to
10 see the actual recording, that recording is I think it's
11 0703-E, I think that's the recording, the actual recording,
12 but I don't like to make a point to waste peoples ten minutes,
13 time, to look at this recording.

14 But I just want to focus at the end of the
15 recording, FBI Agent Bruno asked the question, so if Hu Ji, is
16 government? Yes, you said he? And Linguist, I think he's the
17 interpreter, translator, Mr. Yong Zhu's response, he said I
18 really don't know. I thought maybe he's like a private
19 detective.

20 That was Yong Zhu's answer when he was asked by
21 FBI Agent Bruno whether or not he knows Hu Ji is government
22 agent -- government representative of China.

23 And, ladies and gentlemen, I urge you, when you go
24 back to the room to deliberate, if you want to see the actual
25 video, you can see it. It's only very short video. It's a

1 very short video.

2 Now, the point what I was making is, when he give
3 that answer, nobody was helping him, right, nobody guiding
4 him, give him hint how you can answer the government's
5 question, FBI's question. He answered this spontaneously,
6 naturally. That was at a time he was arrested, right? So he
7 gave that answer. It kind of substantiates or it is kind of
8 his position from beginning toward now that he didn't know
9 that he -- his Chinese contact was from the Chinese
10 government.

11 THE COURT: Did you say he didn't know?

12 MR. TUNG: He didn't know.

13 THE COURT: Okay. Just so the record's clear.

14 MR. TUNG: Sorry.

15 THE COURT: No, no, it's okay.

16 MR. TUNG: So, if I go back to that telephone
17 traffic charts, the charts clearly present compelling --
18 presents compelling evidence that highlights the diminishing
19 role of Yong Zhu as the middleman following their meeting
20 between the Chinese contact Hu Ji or Eric Yan and the private
21 investigator Michael McMahon on October 27, 2016. The chart
22 demonstrates that the frequency of the phone calls involving
23 Yong Zhu with Hu Ji significantly decrease with only sporadic
24 communications between -- I mean, occurring a few times in
25 October 2016 and thereafter. Starting from November,

1 December, there's no phone calls there.

2 And then in the chart for the 2017, it reveals a
3 complete absence of calls between -- I'm sorry, between
4 Yong Zhu and his Chinese contact, a private investigator,
5 through the interpreter. And this clearly indicates that
6 Yong Zhu was never considered by the Chinese contact -- by his
7 Chinese contact as an integral part of their alleged plan or
8 scheme of the so-called operation Foxhound program. He was
9 just present there, introduced his Chinese contact to the
10 private investigator he found for the Chinese contact.

11 I remember at the opening, the government said, but
12 for Yong Zhu's initial contact, right, to introduce to the
13 detective, right, this entire thing wouldn't happen, but for
14 Yong Zhu's involvement to introduce someone to
15 Detective McMahon, so then the rest of those things started,
16 but, ladies and gentlemen, I'm asking you to think a -- just a
17 very common sense question, if a killer of many victims,
18 right, if there's a massacre killing, okay, do we hold the
19 mother of that killer simply -- I'm not saying anything else,
20 simply for the reason that she gave the birth to that killer
21 to be liable for the victims or victims' families? Do we?
22 No, this is too remote, right?

23 If someone -- this is similar to a situation here.
24 Yong Zhu only introduced the Chinese contact to
25 Detective McMahon. Whatever happens after that, right, he has

1 no involvement. Even if he wanted to, they don't even want
2 him. We can't hold Yong Zhu to be liable for all these
3 subsequent consequences or events. Just like I said, a mother
4 gave birth to the killer, if the killer later, when he grows
5 up, right, kills so many people, we cannot blame on the mother
6 just for the fact that she gave birth to the killer. It's a
7 similar situation here.

8 And, ladies and gentlemen, I ask you to pay
9 attention to all the evidence presented by the government.
10 Have you seen any evidence that the -- his Chinese contact
11 Hu Ji or Eric Yan, before he came to the United States or
12 after he came to the United States, giving Yong Zhu anything
13 to identify himself as a Chinese official such as a business
14 card or anything? Have we seen any of these evidence here?
15 It is upon the Government's burden to prove that Yong Zhu knew
16 that the Eric Yan or Hu Ji was a Chinese Government
17 representative. We have not seen any of those evidence here.
18 Therefore, Yong Zhu did not know the real identity of
19 Eric Yan, of Hu Ji, or his true intention to come to the
20 United States to locate a person for the purpose to re-patron
21 them back to China. They always had the belief it was just to
22 grab a private detective.

23 Now, I would like to show Government Exhibit 4012.
24 It's a comprehensive report generated by Mike McMahon.

25 MR. HEERAN: We can put that on our screen.

1 THE COURT: All right. I presume it contains some
2 redactions?

3 MR. HEERAN: Yes, Your Honor.

4 THE COURT: Okay, go ahead. You're supposed to be
5 using the redacted versions. There we go, okay.

6 MR. TUNG: That's fine. Thank you.

7 On the second page, second or third page, I think
8 third page, there's a box here, there's a shaded box here,
9 right, that's -- okay. This box says, right, INTERPOL most
10 wanted and then the name of Shi Zheng Zhu. And this was the
11 very first time Private Investigator Mike McMahon found, he
12 found, he generated this report, and he sends this report to
13 the interpreter who is talking to -- who is supposed to help
14 Yong Zhu, and the date of this report is October 5, 2016.

15 So the government's position is, here we go, he
16 should have known this guy is most -- is wanted by the Chinese
17 government, right, so he must be -- you know, whatever the
18 work you're getting, must be related to Chinese government
19 work. But this doesn't really make any sense here, ladies and
20 gentlemen.

21 What the evidence so far shows, Detective McMahon
22 was getting an order, right, from Yong Zhu for Xu Jin why you
23 from the Chinese contact, he was supposed to locate a person
24 for the company. Now, when he ran a background check, it just
25 pops out that person just happens to be a person who is also

1 wanted by the INTERPOL. There is a big difference here. The
2 big difference is he was not told to find someone who is
3 wanted by INTERPOL. He just accidentally runs a background
4 check just like over here we're doing background check all the
5 time, and it turns out to be that person has a criminal
6 background -- a criminal history.

7 So this is a coincidence. This does not prove that
8 government -- government presented evidence does not prove
9 that the -- either Detective McMahon or Mr. Yong Zhu was aware
10 or became aware that the -- on October 5, 2016, this work
11 they're getting from Chinese contact was for government work.

12 THE COURT: Mr. Tung, I'm not sure how much longer
13 you're going to go but I did want to tell you we're going to
14 take a break at 4:15. Because since obviously the jury's been
15 here for the last couple of hours since lunch and I want to
16 give them a break.

17 MR. TUNG: Sure. I have another 15 minutes. So can
18 we just take a break now?

19 THE COURT: Okay.

20 Let's take our break now, ladies and gentlemen.
21 Don't talk about the case, keep an open mind, don't do any
22 research, just relax for the next 15 minutes. And remember we
23 have Mr. Tung's conclusion and then the government will do a
24 rebuttal.

25

1 (Jury exits the courtroom.)

2 THE COURT: Everyone else, you have roughly 15
3 minutes, a little longer. We'll start again at 4:30.

4 (A brief recess was taken.)

5

6 (Continued on the following page.)

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1 (Continuing.)

2 THE COURT: Okay. So we're going to get everyone
3 back in the room, Mr. Tung.

4 THE COURTROOM DEPUTY: All rise.

5 (Jury enters the courtroom.)

6 THE COURT: Please be seated, everyone. Mr. Tung,
7 you may resume your argument.

8 MR. TUNG: Thank you, Your Honor.

9 Have a good break?

10 Ladies and gentlemen, I'd like to show you one more
11 time -- I know you have seen this exhibit many many times, but
12 this is a very crucial one, and I'd like to show you
13 Government Exhibit 4019B.

14 THE COURT: Is that okay to display?

15 MR. HEEREN: That's fine, Your Honor. Yes.

16 THE COURT: Okay. Go ahead.

17 MR. TUNG: Maybe I just read it out, what's on that
18 exhibit. You know this already, because I cannot -- this is
19 the communications between Private Investigator McMahon and
20 with his fellow investigator Eric Gallowitz.

21 On October 5th, 2016, when Detective McMahon
22 discover that was the target was wanted by INTERPOL, he sent
23 some messages to his fellow detective. PLO says, he wanted by
24 INTERPOL, wow. And then the next page, he ask, he caution
25 his -- Eric Gallowitz, bring your gun. And remember yesterday

1 you heard Eric Gallowitz testify and he kind of joke, you
2 taking care of self, I will bring my gun.

3 Now, the reason I'm showing you this document
4 because this is actually -- you see the response from
5 Detective McMahon. Wow, when you find something. So this
6 clearly, it supports my argument on October 5th, that was the
7 first time they discover, that was coincidence, it was never
8 told by the Chinese Government the target you're looking for
9 is wanted by the Chinese Government.

10 I'd like to show you Government Exhibit 4004.

11 MR. HEEREN: That's fine, Your Honor.

12 THE COURT: Okay. You can publish.

13 MR. TUNG: This is the communications between the
14 interpreter and Private Investigator McMahon when they talking
15 about how to nail the contract between them. I like to ask
16 you when go back to the deliberation room, to look at the
17 page. I don't know the page number, but look at the page
18 which I'm showing you now -- you have seen this before.
19 McMahon was telling -- was asking, was communicating with the
20 interpreter. I'm sure he used this, but he didn't tell us. I
21 think he should have. He wanted for corruption, embezzlement,
22 and taking bribes.

23 Okay. Now, this communication -- and actually,
24 there was a previous question, yes. Okay. Would you think it
25 will be okay to share this information with Mr. Zhu or should

1 I not to pass this information to him. That was the
2 interpreter talking and Detective McMahon just answered, I'm
3 sure he knows this, but he didn't tell us.

4 Now, the reason I'm showing you this document is I
5 would like to tell you clearly you see first -- and let me
6 still have this displayed up there. The interpreter was
7 asking the detective, should I tell Mr. Yong Zhu because
8 that's her client who was asking her to do translations, and
9 then the detective says, well, I think you knew about it. But
10 my argument to you is, if Mr. Yong Zhu would know that the
11 target was most wanted by INTERPOL or the Chinese Government,
12 there's no reason he didn't want to tell them, tell the
13 detective.

14 And the other point I would like to point it out is
15 when the interpreter was asking the Detective McMahon, should
16 I tell Mr. Yong Zhu about this, now, have you seen any
17 evidence throughout all these communications between the
18 interpreter and the detective, Private Detective McMahon? All
19 these communications was not directly between McMahon and
20 Yong Zhu. Have the Government met their burden to prove
21 Defendant Yong Zhu was told by the interpreter all these
22 communications. Obviously, you know, the interpreter was not
23 called as a witness here. So if there was a gap here, I
24 submit to you that raises issue of beyond reasonable doubt.
25 The Government has to prove that Yong Zhu was told about this.

1 Nothing. Is just an assumption. The interpreter would
2 automatically to tell Yong Zhu was transpiring in all these
3 messages exchange between the interpreter and the detective.
4 So that's why I'm saying, Yong Zhu has no burden to prove
5 anything. Government has not proved that Yong Zhu was made
6 aware of that, at least on October 5th, 2016.

7 Remember, I said earlier Mr. Yong Zhu went to see an
8 attorney. If he knew if the Chinese contact, right, told him
9 already that the target was INTERPOL, I think he would have
10 revealed that to the attorney. Why did he pay money, a
11 consultation fee to an attorney without telling her the truth?
12 So he was getting all these responses which is misguided,
13 right. Because, you know, attorneys communication with
14 attorney is attorney-client privilege, covered. He wouldn't
15 have to worry about --

16 MR. HEEREN: Objection, Your Honor.

17 THE COURT: Overruled.

18 Again, ladies and gentlemen, this is just an
19 argument.

20 MR. TUNG: Yong Zhu should have known that when he
21 consulted an attorney, his communication with Attorney Shi,
22 nobody can look at this, even Government cannot look at this.
23 So it is no reason he is not going to tell the people in this
24 chain, Attorney Shi, the interpreter, and McMahon at that
25 time, you know, when they -- when Mr. Yong Zhu tried to help

1 the Chinese contact to find the private detective. So my
2 point is, this is for everybody, including Private Detective
3 McMahon, in October 2016, nobody, nobody, knows that the job
4 was ask them to do to find someone is from Chinese Government.

5 Now, ladies and gentlemen, I'm going to do a
6 comparison. You have seen -- I'm going to show a
7 communications between Johnny Zhu and Allen Jin, which is
8 Government's -- both of them -- not both of them, I'm sorry.
9 Allen Jin real name is Jin Hongru. He took the stand to
10 testify, and I'm going to show the exhibit here so you see the
11 comparison here. What I'm showing you now is Government
12 Exhibit 0807F.

13 Thank you for your help. Finally Government helps.

14 What is being shown is the messages and
15 communications between Government witness. What's his real
16 name? I forgot. Jin and Johnny Zhu. Now, this is a
17 situation that I'm going to show you -- look at the page, I'm
18 going to show you now, is April 1st, 2017, Johnny Zhu was
19 talking to Allen Jin. And look at this, where I'm pointing
20 to.

21 Correct. Just follow the instructions when working
22 for the Chinese Government. It will be just fine by playing
23 dumb and not asking questions. I will make the arrangements.

24 Now, this is just one lowly example. Remember, the
25 witness testified, right, that witness testified, he knew

1 exactly he was working for Chinese Government.

2 And also, I'm going to show you Government's
3 Exhibit 0812C. And also, on the same day, right, April 1st,
4 2017. I mean, look at this, the compensation is 1800 U.S.
5 dollars. So the point I'm making here is, if someone is, was
6 recruited by the Chinese Government or through a intermediate
7 person, what's that person, Allen -- Johnny Zhu, they would be
8 told explicitly, you're working for the Chinese Government.
9 This is what you're going to be paid for. Then you compare to
10 the situations applying to Mr. Yong Zhu. Has the Government
11 presented any evidence such as even casual communications
12 between the Chinese contact and the Yong Zhu, anything like
13 this can be referenced to that was the job given by the
14 Chinese Government? The answer is no.

15 Have you found any evidence that it was any
16 communications between the Chinese Government, Eric Yan,
17 Hu Ji, with similar communications with Detective McMahon?
18 The answer is no. So that's a clear comparison. When you see
19 this, if you are recruited by the Chinese Government, you have
20 evidence here. If Government cannot prove, cannot produce any
21 of those evidence, they cannot present any of those evidence,
22 that means there is a serious question of beyond a reasonable
23 doubt to hold my client liable for.

24 In addition, even though attorney for Paul
25 Goldberger has repeatedly stated, but I'm saying for my

1 client, I just want to bring your attention to the event for
2 Zheng here. You heard the testimony when Paul asked --
3 Mr. Goldberger asked, right, where did you get this job,
4 right? It was from California by the person Chen Chaohong
5 called and he said it was from a dai lo. Actually, dai lo
6 is -- that's slang. What that meant is a mafia family to do
7 kind of debt collections and things of that sort, right. So
8 if a job is given by Chinese Government, it will be clearly
9 spelled out. Under that circumstances, it was not spelled
10 out. It was just people referring to dai lo in China.

11 So when you do all comparisons with all defendants,
12 right, the defendants who took the stand, they pleaded guilty
13 because they are guilty. They work for Chinese Government.
14 That's why he had to plead guilty, that he worked as an agent
15 for the Chinese Government.

16 And the people, three people here, sit here, the
17 Government has not presented evidence sufficient to
18 convince -- at least convince me, and I hope, you know, they
19 have not convinced you either.

20 What I'm showing you know is another exhibit of
21 Government Exhibit 0402U.

22 THE COURT: Is the Government fine with this being
23 publicly displayed, 402U?

24 MR. HEEREN: Yes. It's fine, Your Honor.

25 THE COURT: All right. Go ahead.

1 MR. TUNG: Now, ladies and gentlemen, this is a
2 document generated by U.S. Customs and Border Protections
3 which list all the international travels by my client,
4 Mr. Yong Zhu. And you look at those yellow line area.
5 Between 2017 and all the way up to 2019, Mr. Yong Zhu has gone
6 back and forth to China many many times. Remember, the
7 question is -- remember when, on or about April 7, 2017, when
8 Tu Lan for some reason, they kind of noticed their functions
9 here, whatever they doing here was kind of being watched by
10 somebody, maybe FBI, so she wasn't supposed to leave
11 April 12th, right. Five days earlier, she book the flight,
12 she left, and she notified, right, with all these e-mail
13 communications, notified Johnny Zhu, you got to leave, right.
14 Something like this. This is going to be dangerous now.
15 Somebody kind of knows. So Johnny Zhu left on April 12, 2017
16 too, and they never came back here.

17 These are the real criminals. Now, look at
18 Yong Zhu. If Yong Zhu did consider a major player in that
19 circle, do you think they wouldn't have to notify him? please
20 leave with us, don't ever come back to the United States,
21 you'll be caught, you'll be charged, you'll be convicted here,
22 you'll go to jail here. No. And look at how many trips
23 Yong Zhu made to go to China between entering there and coming
24 back, for whatever reason. It could be for family reasons,
25 right. We do not know. But it could be many reasons, right.

1 Nobody ever, from Chinese Government, obviously, I can argue,
2 could infer from the facts, they warned him, right. Don't go
3 back to U.S. because you may be caught. You maybe prosecuted.
4 Okay.

5 Earlier today, Government showed evidence, a
6 picture -- I don't have it. I just mention the fact that they
7 showed a chart showing that in May of 2018, that they say
8 Yong Zhu, before he booked a flight to China, he went to 315,
9 the sister Feng Liu's house in Short Hill to take two
10 pictures. And Government's position or their argument saying
11 that this is the -- this is the fact, that Yong Zhu continued
12 to do surveillance at the premises. I am asking -- I mean,
13 yes, the Government can say, you can infer from some facts.
14 Inference, you still have to have some background, right. You
15 cannot just infer from a fact like this. Now, I can infer
16 from the facts, I can give you 10 different, even more,
17 different possibilities with this fact. The Government has
18 got to prove that Yong Zhu went to the premises on May 13,
19 2018, to commit a crime. What they just showed, he booked a
20 flight to China. I just showed you a traveling record.
21 Mr. Yong Zhu went to China all the time, back and forth, back
22 and forth. Why the Government would say this time in 2018 he
23 went back to China because he went -- I mean, five days
24 before, he went to take a picture of Short Hill address?
25 There is nothing there. They just want to ask you to infer.

1 From where? I'm actually -- I'm arguing here, what he did, I
2 now can argue is this clearly shows he was already out of this
3 loop. Everybody here know, everybody in this room know by
4 now, Short Hill house was no longer an interest for Chinese
5 Government for anyone here, because Xu Jin is not living
6 there. Once his real house in Warren was discovered, who
7 cares about the sister's house? So why? You know, the
8 question, I cannot answer because I don't have to answer. The
9 Government has to give more, such as, like, they captured all
10 these communications between those defendants. They got to
11 show more. Mr. Yong Zhu, such as, received instructions from
12 Chinese Government, please go to -- in 2018, right -- to
13 please go to Short Hill property to take some pictures for us.
14 Did you see any evidence like this? No. Right. So why
15 Mr. Yong Zhu went there to take pictures? Could be for many
16 many reasons.

17 Another reason, I can give to you, he was consider
18 himself a middleman. He wasn't paid for what he introducing
19 Mr. McMahon to them. So maybe he was wanted to take some
20 pictures to go back to China to argue with them, how come I
21 don't get paid? These are just millions and millions of
22 possibilities there, ladies and gentlemen. Yong Zhu doesn't
23 have a burden to prove. I submit to you, Government present
24 this evidence, shows nothing, nothing more than a speculation.

25 And remember this morning, the Government, in their

1 argument, they say in the -- they show a document which says
2 Yong Zhu says that was the interpreter talking to McMahon.
3 Yong Zhu was talking about the target owed him a lot of money.
4 I do not know if you still remember that. I don't have the
5 evidence here because they have it. I wasn't prepared because
6 that's something they brought in this morning. So I don't
7 have the slides here.

8 Now, he said -- she said, it's a lie, it's a lie,
9 it's a lie, because the target does not owe money to Yong Zhu.
10 But my question here is, wait a minute, Government, did you
11 show proof that was the communications, conversations between
12 the translator and somebody else, right? Something's missing
13 here. Government got to show Yong Zhu sent to anybody,
14 Yong Zhu made that statement. Then Government can say, this
15 is a lie. I mean, the target does not owe you money, the
16 target owes the Chinese Government or company, money. So
17 that's why when Government presents evidence, they got to
18 prove, you know, with something beyond reasonable doubt. They
19 kind of throwing those facts here and making you, the jury, to
20 sorting out, then with all these confusions and with thousands
21 of pages of these documents. How could you determine, right?
22 They got to give you a -- this case is not so complicated. If
23 they have sufficient evidence, it should be very
24 straightforward, A, B, C, D, E, F, G, to arrive at their
25 conclusion. Have we seen them here? No. The answer is no.

1 THE COURT: Mr. Tung, I do want to remind you of
2 your 15-minute estimate after the break.

3 MR. TUNG: Finishing up, Your Honor.

4 THE COURT: Hang on. You're already going on a half
5 an hour, so you do need to wrap it up.

6 MR. TUNG: Sure.

7 I think some other points covered by the other
8 counsel, so I'm not going to belabor it here. And let's see
9 if I have anything more.

10 Okay. So then I'm going to wrap it up in few words.

11 One thing I pointed out to you, you know, remember
12 the process the Government experts -- I mean, I do not know,
13 it's not hundreds of them, a couple of dozens of them, coming
14 up to take the stand to show the pains, the painstaking
15 process to prove the people here with all these pictures
16 right, on this board, are Government officials. They had to
17 collect information from immigration, Homeland Securities, all
18 of these things, right. I submit to you the defendants here,
19 even including the expert, Professional Private Investigator
20 Michael McMahon, wouldn't have the same access like the
21 Government can do to prove these people are Chinese Government
22 officials.

23 So now, ladies and gentlemen, back in October 2016,
24 you going to place a burden on these people to find out those
25 people they were talking, Eric Yan, all of these people,

1 Eric Yan, Hui Sun, Tu Lan, was Government officials, and while
2 these Chinese Government officials never disclosed themselves
3 to them, we are from China, we are here to do a Government
4 job. It's not fair to place that burden on these three
5 defendants here to figure that out.

6 Now, remember we ask questions for the professor.
7 Forty years of experience with Chinese Government structures.
8 I'm asking you a question. How many people here in this
9 courtroom understanding the complex Chinese Government systems
10 with CCP, with Chinese Government, ruling parties? These are
11 the things I have heard for the first times. I learned
12 something. Yes, I respect the professor. But you ask these
13 people to understand, to figure all this out in October of
14 2016? Come on. Our Government, you have heard testimony,
15 professor, even an expert in Chinese affairs, all these
16 Government affairs, he has rarely seen any Government warnings
17 by the United States, right, to warn its people that, please
18 be alert, foreign intelligence, foreign Government may use you
19 as a pawn to carry out their missions here in the United
20 States. Please watch out. How many people have here heard of
21 this? Yes, we have heard, there's a war going on in
22 somewhere, please let's evacuate, and the Government gives
23 warnings, let's United States citizens, I will give you
24 warning, please evacuate from that country. But there's no
25 similar warnings whatsoever was given. It is very easily for

1 ordinary Americans, naive Americans, to walk into this complex
2 web of those deceptions, all of these things here. And they
3 are already in bad shape to figure this all out, what I'm
4 getting into this.

5 I do not blame Detective McMahon. He has to make a
6 living. That's his business. And Mr. Yong Zhu, he doesn't
7 have a job. He's running odd job. He basically got to
8 somebody else that say, if you go to U.S., to find someone for
9 me, and he thought there was nothing wrong with this. Without
10 any warnings, sufficient warnings surrounding, people do not
11 become so alerted. Ladies and gentlemen, that's why I'm
12 asking you to think about this now. They are also victims.
13 They are used. They're used by a very sophisticated
14 Government. People are using them. Government -- Chinese
15 Government, they are use them. They never told them. They
16 never give them the business card. They told them to go for
17 finding a private debt collection, right. So all of this, I'm
18 feel very sympathetic to them --

19 THE COURT: Mr. Tung, be careful.

20 Your sympathy is irrelevant to the jury.

21 MR. TUNG: I know. I'm going to finish up, okay.
22 Very quick. One more sentence. I'm going to end this.

23 Ladies and gentlemen of the jury, the fate of
24 Mr. Yong Zhu rests at your hands. They are helpless. Look at
25 this. They were used, cheated, misguided by foreign

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1 Government to work for them. They unknowing, unknowingly did
2 something for the foreign Government. We did not deny, like
3 Mr. Lusterberg said, we did not deny what they did, but they
4 unknowingly did it, and instead, our Government didn't help
5 them. Prosecuted them here. The only person in this room can
6 help them is you. I sincerely ask you to look at evidence.
7 You don't have to look at thousands of evidence. I kind of
8 give you summary of these evidence. These are crucial
9 evidence that I think can clear my client's name and return a
10 favorable verdict in my client, Yong Zhu.

11 Thank you very much for listening to my talking
12 today.

13 THE COURT: Thank you, Mr. Tung.

14 Mr. Heeren, why don't you start your rebuttal,
15 understanding that we're going to stop at 5:30.

16 MR. HEEREN: Yes, Your Honor.

17 THE COURT: Okay. Do you need to set up anything?

18 MR. HEEREN: Yes, I do need a moment.

19 THE COURT: Okay. Just take a second.

20 Do you need the mic, Mr. Heeren?

21 MR. HEEREN: I do, yes.

22
23 (Continued on the following page.)
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25

1 (Continuing.)

2 THE COURT: So, ladies and gentlemen, I know it's a
3 little bit past 5:00, but I think every moment should be used
4 because obviously we want to get you to your deliberations, so
5 that's why I'm going to ask the government to start their
6 rebuttal. But we will stop at 5:30. I know that a number of
7 you have commitments after this that you have to get to.

8 Go ahead, Mr. Heeren, whenever you're ready.

9 MR. HEEREN: Yes, Your Honor.

10 Is that loud enough for everybody?

11 THE COURT: It seems so.

12 MR. HEEREN: Great.

13 Good afternoon, ladies and gentlemen.

14 THE JURY: Good afternoon.

15 MR. HEEREN: Thank you very much. I know it's been
16 a long day.

17 The defendants, they made a series of deliberate
18 choices and they're here for specific conduct that they did.
19 They made a choice to turn the victims' lives upside down.
20 And when you cut through all of what you've heard and you
21 focus back on the evidence and the conduct by these three
22 individuals, you see that they agreed to participate in
23 something that went way, way over the line, a line that is
24 obvious to anyone who looks at the evidence in this case. It
25 was a line that all three defendants knew they were crossing

1 when they made the choice, and it was a choice, to go out and
2 harass and intimidate these people, knowing they were doing so
3 for the Chinese government. One of them was previously
4 responsible for investigating and upholding the law and
5 counsel spent some time pointing that out, but that just shows
6 that he knew even better than most that the choices he made
7 was both illegal and wrong.

8 Now, I'm not going to respond to all of the
9 arguments made by each of the three defendants. I'm going to
10 clarify some of the key points that I submit you should be
11 focusing on when you deliberate. Because we saw that you paid
12 close attention during this trial and you've seen and heard
13 all the evidence. And most importantly, when you go back into
14 that jury room, you bring with you something critical, which
15 is your common sense. You can bring that with you and you
16 should rely on that. And because of your careful attention,
17 your review of the evidence and your use of common sense, we
18 know that it will lead you to the only conclusion that is
19 supported by the evidence, that all three of these defendants
20 are guilty as charged.

21 Now, I want to start looking at all three defendants
22 together. There has been some discussion about a lack of
23 direct evidence, there's no evidence, not a shred of evidence,
24 lots of talk about that there hasn't been any evidence over
25 the past two weeks. I submit to you that's not correct.

1 There's a substantial amount of evidence, both circumstantial
2 and direct evidence. Each of these three defendants knew what
3 they were doing and the overall goal of the criminal scheme
4 that they participated in. You know not just from what they
5 claim is circumstantial evidence, but you know that from their
6 own words.

7 Jason Zhu admitted clearly and unambiguously that he
8 knew the person he was working with, Hu Ji, worked for the
9 Chinese government and that their plan was to locate the
10 victims to return them to China. Go listen to it. We
11 encourage you to listen to all these postarrest statements,
12 too. After he made that admission, he tried to backtrack and
13 said: Well, all those things I said about the Overseas
14 Chinese Affairs Committee and the departments who are all
15 working together with reward, I -- I don't know; you're right,
16 I don't know. But listen to what he said before "I don't
17 know." He knew they were Chinese government officials and he
18 knew the scheme, the overall objective was to return this
19 person against their will to go back to China.

20 Go listen to Michael McMahon's statement after he
21 was arrested. He admitted to two key facts. He knew that the
22 people who hired him wanted to get Xu Jin to return to China
23 so that they could prosecute him. There was no ambiguity in
24 that statement. He was not confused by the words that he
25 used. He used the words "prosecute him." His friend Eric

1 Gallowitz completely understood the words "prosecute" when it
2 was used, another fellow NYPD officer. Mr. McMahon knows what
3 "prosecute" is. He knew that. He knew this was a government
4 criminal operation.

5 And importantly, after suggesting it might be a
6 typo, Mr. McMahon admitted that he had suggested he personally
7 proposed to harass the victims. And he went and explained it.
8 He said, you know, sit outside the house, they'll know you're
9 there, and then maybe they'll turn themselves in. Go listen
10 to it again. You don't turn yourselves in if you're in the
11 middle of a civil litigation. You turn yourself in if you
12 think they're trying to arrest somebody.

13 And Congying Zheng, his expression of his
14 understanding of the conspiracy is found in the written
15 document that he saw, that his counsel admits he saw. And
16 then seeing that document, seeing that he had a note in his
17 hand that said return to China and then your family will be
18 safe if you spend time in prison in China, then he posted it.
19 He knew what this was about when he did it. And you can infer
20 his knowledge further when he was questioned about it and
21 lied. There was a lot of discussion about Mr. Kuang's lies,
22 but go watch the postarrest statement by Zheng. Lied. "I
23 just drove him. I had nothing to do with the note. I didn't
24 even know about the note." Why did he lie when he was
25 arrested? Because he knew what he did was wrong and a crime.

1 The defendants have suggested this was all
2 happenstance; at best, different conspiracies. That's
3 inaccurate. The reason why all three of these defendants have
4 all essentially said the same thing, the reason why they were
5 all directed to do essentially the same thing in different
6 ways is because they all participated in the same criminal
7 conspiracy. It does not matter -- and you're going to hear
8 more of this when you hear from the Court about conspiracy
9 law. It does not matter that some of the defendants didn't
10 know each other or didn't know the same people who gave them
11 their immediate directions. These messages can get passed
12 down through people. What matters is that they have the same
13 goal, the same unifying objective throughout. And that was
14 clear, they did. The question is whether they were working to
15 further one common unlawful design or purpose. I expect
16 that's a phrase you'll hear. And if so, then a single
17 criminal conspiracy exists. And that is, in fact, the case
18 here.

19 Now, I want to spend some time talking about each of
20 the individual defendant's arguments. I want to start with
21 Mr. Zheng. And I suppose I should start with the point that,
22 as my colleague pointed out, Mr. Zheng is charged with four
23 offenses: Two conspiracies and two substantive offenses. And
24 counsel for Mr. Zheng spent a lot of time talking about
25 conspiracy and withdrawal from the conspiracy and he spent no

1 real time talking about the substantive offense. And there's
2 a reason for that. And that is because this claim of
3 withdrawal, which is without merit, and I'll get to that, but
4 this claim of withdrawal only relates to conspiracy. It does
5 not act as a defense to a completed substantive offense. If
6 you go and commit a bank robbery and you go back the next day
7 because you feel bad about it, you're not suddenly not guilty
8 of it. And as counsel for Mr. Zheng said, essentially
9 conceded, yeah, he did it, I guess that part was wrong, but he
10 tried to make up for it.

11 But he's also guilty of the conspiracy. Listen to
12 the Court's instruction. Again, like everyone else has said,
13 if anything I say differs, please follow the Court's
14 instruction, not what I say. But what you'll hear about what
15 is required to withdraw from a criminal conspiracy is that
16 it's a significant burden, an extremely high burden. The
17 defendant must have, in good faith, completely withdrawn and
18 taken steps to terminate or abandon his efforts. By way of
19 example, I expect you will hear a person withdraws when they
20 call the police in time or do things that make it impossible
21 to commit the crime. Think about what Zheng did. He
22 committed the crime. He went there, he posted the note. The
23 note was received. The family was terrified. And then he
24 went back to the scene of the crime, looked around and left.
25 That's not withdrawal. That's the best version of it. But

1 that's not the only inference or the most likely inference you
2 can draw. The most likely inference, the fair inference to
3 draw is that he went back to confirm the crime was completed,
4 to confirm they got the message. You heard from Vincent Kuang
5 that they were unsure whether they still lived there. They
6 saw packages. That the people directing them had said find
7 out, and that's what he was really doing. Was the message
8 received? He saw the note was taken, the message was
9 received. That's not withdrawal. That's continuing the
10 conspiracy. And mind you, that confirmation allowed that
11 conspiracy to continue and the pressure to be ratchet up,
12 because after that mailings continued to arrive at these
13 victims' homes.

14 How else do you know Zheng didn't withdraw? Because
15 when he was finally arrested, he didn't say you're right, I
16 didn't -- this is wrong, I went back, I tried to stop it, I'm
17 so sorry. He lied. He lied and lied. He said, quote, "I
18 didn't post the note." Quote, "All I did was give Vincent a
19 ride to that address." That's not true.

20 You saw the trail camera footage. Watch it again.
21 Who was leading the charge? Zheng was in the front the whole
22 time leading the way, showing where to go. Mr. Kuang is
23 guilty too, but Zheng was the one leading the way.

24 The idea that Zheng withdrew is just not accurate,
25 it's not consistent with the evidence. You can safely reject

1 it and you can convict Zheng not only of the substantive
2 offenses, but the conspiracies as well.

3 Now, I want to touch on one other point counsel for
4 Mr. Zheng made, which is his other primary argument, is that
5 he didn't know, the only evidence is that he knew he was
6 receiving this message from a gangster. That's essentially
7 the argument. So he couldn't have possibly known that this
8 message actually came from the Chinese government. And I
9 believe my colleague briefly mentioned this, but you're going
10 to hear from the Court about conscious avoidance, and the
11 Court is going to tell you that you cannot deliberately close
12 your eyes to what should have been known to you. The
13 circumstances show that Zheng knew or, at best, closed his
14 eyes. Again, the note is clear as a bell. It talks about
15 going to prison. It was not a complex message or a difficult
16 one to comprehend. It was written in a language he
17 understood. There is evidence in the record of that.

18 And the surrounding circumstances further show this.
19 Zheng and Kuang were checking if the victims were home by
20 knocking on the door, twisting the handle. Because as Kuang
21 told you, if they were home, they were going to read it right
22 to them and hand it to them. Zheng told you -- excuse me.
23 Kuang told you that Zheng knew that Kuang knew about Operation
24 FOX HUNT from Chinese social media and that Zheng paid
25 attention to the same social media. And you know that Zheng

1 talked privately with Chen Chaohong about this conduct
2 beforehand and knew that others were previously involved.

3 The scheme itself, the message itself is enough to
4 show that Zheng knew or closed his eyes as to what was obvious
5 to him. So not only is he guilty of stalking and harassment,
6 which I think is effectively conceded in some respects, but he
7 did so knowing that it was directed by the Chinese government.

8 I want to briefly address now some of the arguments
9 made by Zhu Yong's counsel in the last few minutes I have
10 here. And I guess the first one I want to start with is this
11 idea that he doesn't do anything but act to hire Michael
12 McMahon and then he's gone. Mr. Tung said he was terminated
13 after 2016, that's it, done. But then if you saw towards the
14 very end, you remember sort of an important fact, which is
15 Mr. Zhu kept working as part of this conspiracy. He went
16 back. He himself went to the home of the victim two years
17 later, took pictures, and then four days after that gets on an
18 airplane and goes to China. What is the only reasonable
19 inference for that? The only reasonable inference is that
20 he's continuing to directly participate in this conspiracy.

21 And again, the idea that Zhu Yong just hired
22 Mr. McMahon, that he had no other involvement, think about
23 that. Think about the evidence you saw. This wasn't simply a
24 person passing a form in a single e-mail. Think about all
25 those e-mails in 2016. Think about the sheer volume of

1 sensitive personal information that was passed from Zhu Yong
2 to Michael McMahon through the translator. That document that
3 we had to redact heavily because it had so much personal
4 information of the victims on it, that came from Zhu Yong.
5 That's not somebody who just hired somebody. That's a man
6 working on behalf of the Chinese government to pass detailed,
7 detailed information.

8 And I want to go back to this 2018 point. I believe
9 Counsel said that there was -- there couldn't possibly be any
10 reason why he did this as part of the conspiracy, there's no
11 reason to go back to Liu Yan's house in 2018 since they found
12 Xu Jin at the Warren residence. That was his argument you
13 heard just a few moments ago. That's not true. He went back
14 because he wanted to see if they were still there. And when
15 he saw the car in the driveway and he brought the pictures of
16 the car in the driveway back to China, what happened over the
17 course of the next year? Mailing after mailing after mailing
18 to that address, to the Short Hills Drive address.

19 Mr. Zhu was a middleman, as he described, but he was
20 a critical essential piece of the conspiracy.

21 I also want to address the point, and it was raised
22 again, that Zhu Yong only did this to collect a private debt.
23 Everyone knows now that's not true. The evidence demonstrates
24 that's just not true. The idea that he was collecting a
25 private debt is belied by his own statements when he was

1 interviewed by us, when he said, well, they were trying to get
2 him to return to China, that there was a whole group of
3 departments trying to get him and they would get a reward if
4 they would get the victim. It makes no sense.

5 And just finally in the few minutes I have left, I
6 want to address counsel for Zhu Yong's suggestion that there's
7 no evidence that he knowingly, knowingly engaged with Chinese
8 government officials. If you remember, he put up that qq.com
9 e-mail address and he said, well, it's just a series of
10 numbers, how could he possibly have known who it is? Think
11 about what he's trying to get you to infer. The evidence
12 shows that Zhu Yong was in contact with Sun Hui and with
13 Hu Ji, two key members of the conspiracy. The evidence also
14 showed that Hu Ji, as you know and you heard so much about,
15 came here and participated directly in the harassment of the
16 family. And the evidence shows that Sun Hui was receiving
17 reports back through Johnny Zhu, another member of the
18 conspiracy. If you go back in the record, you'll see that
19 same e-mail address was used by Johnny Zhu to deliver
20 reporting in April 2017. So the idea here -- just think about
21 it. The idea is that this was entirely a coincidence, that
22 Jason Zhu inadvertently was communicating with these same
23 Chinese government officials directing this campaign, giving
24 them the same types of information they want and need and it
25 was purely a coincidence. That defies common sense and you

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1 can safely reject that argument.

2 THE COURT: Just a couple more minutes, Mr. Heeren,
3 before we break for the day.

4 MR. HEEREN: Yes, Your Honor. I think I might be
5 moving on to another topic, so this might be the right time.

6 THE COURT: All right. So why don't we stop here,
7 folks. It's just 5:29 now.

8 Remember, still do not talk about the case, do not
9 do any research, keep an open mind.

10 You will get the case tomorrow after the government
11 finishes its rebuttal and after I instruct you on the law.
12 Okay?

13 So have a great night. Get some sleep. You have a
14 lot to do tomorrow.

15 THE COURTROOM DEPUTY: All rise.

16 (Jury exits.)

17 THE COURT: Everyone else can have a seat.

18 So we'll start again -- I think just everyone needs
19 to be ready to go at 9:30. I don't anticipate any issues that
20 we have to address.

21 The only thing I will say is that at this point the
22 jury instructions are ready to go. The only final detail
23 we're working out is the list of the overt acts. And the
24 government has provided lists for each of the counts, which is
25 Count One and then Count Three.

1 The only remaining issue, and this is what I propose
2 -- or I'm telling my law clerk to do, it's not really a
3 subject of debate, is whether to replace John and Jane Doe
4 like we did before in the instructions themselves with
5 bracketed references to the real names of the victims. I
6 think there was a proposal to include a code sheet, but I
7 don't see any reason to make them hunt for it, and this way it
8 will reference directly the instructions themselves.

9 So I'm assuming the defense has seen the overt acts
10 list that the government has generated. The only difference
11 with the one that we'll send back to the jury is that the
12 victims' true names will be -- I should say the alleged
13 victims' true names will be included in brackets. Okay?

14 MR. HEEREN: Yes. Does that also include, there's
15 also some pseudonyms for coconspirators and a PRC official.

16 THE COURT: In the overt acts?

17 MR. HEEREN: In the overt acts, yes.

18 THE COURT: Yes. Well, that's an interesting
19 question.

20 It seems to me there shouldn't be any ambiguity or
21 disagreement at this point about who those individuals are.
22 If the defense doesn't have any objection, then we will
23 similarly put in brackets the names of the alleged
24 coconspirators where they should go in the overt acts.

25 So why don't you folks talk about it.

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1 Is there any objection to that in concept.

2 MR. LUSTBERG: Not in concept. I haven't looked at
3 it that way, but that sounds right to me too.

4 THE COURT: What I'd appreciate the parties doing
5 is making sure you take a look at the references to the
6 coconspirators or the unidentified individuals and make sure
7 you all agree that the real names -- or you a) agree on the
8 real names and that those names can be included where they're
9 referenced. Okay?

10 MR. HEEREN: Yup.

11 And we're happy to make a bracketed one so it's less
12 work on the clerk.

13 THE LAW CLERK: I can do it. No problem.

14 THE COURT: She's feeling very proprietary over this
15 document.

16 But just make sure you let her know because -- hang
17 on one second.

18 So I'm just recommending that maybe the government
19 go ahead and do that because it will be subject to your
20 agreement on who the coconspirators are.

21 MR. HEEREN: Okay.

22 THE COURT: Okay? All right. Great.

23 So just send it over by e-mail to the chambers
24 e-mail. Okay? And we'll incorporate it.

25 Otherwise, everyone is fine the with instructions as

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1 they were docketed I think yesterday, right.

2 MR. LUSTBERG: Yes, Your Honor.

3 THE COURT: Okay, great.

4 Have a great night everyone.

5 You don't need to be here at 9:00, but just be ready
6 to go at 9:30.

7 (Matter adjourned to Thursday, June 15, 2023 at
8 9:30.)

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2419 [1] 1933/22 26 [2] 2002/13 2082/21 2639 [1] 1933/23 265 [1] 1933/2 27 [9] 1942/13 1974/25 1980/24 2081/20 2082/23 2083/1 2084/1 2084/3 2087/21 271 [1] 1933/14 28 [3] 2003/3 2019/5 2083/4 29 [1] 2083/8 2:00 [3] 1989/20 2023/17 2023/24	6 68 [1] 2021/6 697 [1] 1947/9 6th [4] 1948/5 1956/8 1993/17 1993/19	
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50 [1] 1951/17 50 percent [1] 2062/18 506 [1] 1952/13 5072 [1] 1952/12		

<p>A</p> <p>admit [1] 1944/8</p> <p>admits [2] 2056/21 2111/15</p> <p>admitted [12] 1934/7 1934/12 1935/17 1937/14 1956/11 1957/5 1973/14 2038/11 2078/7 2110/7 2110/21 2111/6</p> <p>admitting [1] 2019/9</p> <p>ado [1] 1996/6</p> <p>advantage [1] 1950/13</p> <p>adversarial [6] 2048/7 2048/7 2048/10 2048/11 2051/23 2064/14</p> <p>adversarialness [1] 2048/23</p> <p>adverse [1] 2070/3</p> <p>advice [1] 2010/5</p> <p>advise [2] 1990/17 2076/2</p> <p>advised [1] 1990/18</p> <p>affairs [9] 1973/1 1973/2 1973/7 1973/8 1973/19 1974/4 2105/15 2105/16 2110/14</p> <p>afraid [1] 2044/19</p> <p>afternoon [8] 2048/1 2048/4 2060/9 2062/8 2068/2 2068/3 2108/13 2108/14</p> <p>afterwards [1] 1990/20</p> <p>aged [2] 1943/16 1976/10</p> <p>agencies [1] 1973/11</p> <p>agency [1] 2033/16</p> <p>agent [49] 1953/6 1964/14 1964/22 1964/23 1965/3 1965/6 1966/17 1966/21 1968/9 1977/24 1978/18 1979/4 1985/3 1987/10 1998/25 1999/3 2003/7 2011/7 2012/19 2017/6 2021/2 2021/5 2025/7 2025/8 2025/11 2025/12 2025/17 2030/25 2031/19 2033/13 2037/9 2040/22 2050/18 2050/20 2050/21 2052/4 2057/19 2068/19 2070/8 2070/25 2071/2 2071/4 2071/9 2071/17 2085/4 2086/15 2086/21 2086/22 2099/14</p> <p>Agent Bruno [1] 2086/15</p> <p>Agent McCarthy [1] 2025/11</p> <p>Agent Ross [1] 2025/8</p> <p>agents [8] 1964/8 1964/10 2023/2 2049/25 2050/10 2050/12 2052/15 2084/18</p> <p>ago [10] 1952/14 1971/24 1998/14 2007/3 2015/22 2025/20 2049/1 2051/1 2052/3 2117/13</p> <p>agree [4] 1968/15 2066/4 2121/7 2121/7</p> <p>agreed [9] 1934/15 1950/12 1968/24 1987/13 2038/21 2040/1 2071/22 2075/2 2108/22</p> <p>agreeing [3] 1965/2 1966/19 2013/1</p> <p>agreement [40] 1934/17 1941/3 1941/5 1954/16 1954/18 1954/21 1954/24 1955/5 1955/18 1964/22 1964/23 1965/9 1965/13 1965/15 1965/20 1969/10 1977/9 1977/11 1977/15 1992/24 2005/16 2034/24 2034/25 2036/9 2036/17 2037/5 2039/19 2039/21 2040/3 2051/14 2051/16 2051/21 2072/17 2073/18 2074/1 2076/18 2077/24 2079/5 2084/7 2121/20</p> <p>agreements [1] 2015/23</p> <p>agrees [1] 1934/12</p>	<p>ahead [18] 1937/21 1966/9 1967/8 1990/21 1994/11 2067/25 2068/12 2068/16 2069/17 2069/21 2079/17 2086/6 2090/4 2093/16 2099/25 2108/8 2121/19</p> <p>aid [1] 2038/16</p> <p>aided [3] 1933/25 1955/14 2038/12</p> <p>aiding [1] 2038/13</p> <p>airplane [1] 2116/18</p> <p>airport [3] 1996/24 2084/12 2084/14</p> <p>AL [1] 1933/6</p> <p>albeit [1] 2030/3</p> <p>alert [1] 2105/18</p> <p>alerted [1] 2106/11</p> <p>alias [8] 2003/20 2003/21 2003/23 2004/6 2004/20 2026/14 2077/7 2077/9</p> <p>alleged [5] 1972/22 2038/23 2088/7 2120/12 2120/23</p> <p>Allen [5] 2068/18 2097/7 2097/9 2097/19 2098/7</p> <p>allow [1] 2017/4</p> <p>allowed [8] 1977/7 1977/14 2016/24 2037/7 2043/8 2045/25 2050/22 2114/10</p> <p>almost [9] 1937/24 1941/20 1963/13 1975/11 1979/25 1983/24 1993/12 2056/11 2064/16</p> <p>alone [4] 1998/7 2038/21 2073/9 2073/13</p> <p>alongside [1] 1956/21</p> <p>aluminum [1] 2017/10</p> <p>ambiguity [2] 2110/23 2120/20</p> <p>AMERICA [2] 1933/3 2054/4</p> <p>American [3] 2006/13 2007/7 2008/19</p> <p>Americans [4] 2022/3 2022/13 2106/1 2106/1</p> <p>amount [8] 1982/19 2018/23 2031/16 2031/17 2031/19 2032/10 2047/12 2110/1</p> <p>amounts [2] 1982/5 2032/19</p> <p>analysis [3] 1994/14 2032/15 2082/15</p> <p>angry [1] 1959/25</p> <p>answer [29] 1961/7 1987/7 1998/17 1999/2 1999/7 2005/19 2006/21 2007/25 2008/3 2008/5 2019/15 2021/6 2021/13 2021/17 2035/11 2040/18 2040/19 2041/5 2055/7 2085/4 2086/20 2087/3 2087/4 2087/7 2098/14 2098/18 2102/8 2102/8 2103/25</p> <p>answered [5] 1950/21 1961/5 2055/5 2087/5 2095/2</p> <p>answering [1] 2001/7</p> <p>anticipate [1] 2119/19</p> <p>Anticorruption [1] 1974/5</p> <p>Anyway [1] 2011/13</p> <p>apart [2] 1993/16 1993/24</p> <p>apologies [1] 1990/4</p> <p>apparent [1] 1957/14</p> <p>appeal [1] 1948/23</p> <p>APPEARANCES [1] 1933/12</p> <p>appeared [1] 2035/12</p> <p>appearing [1] 1961/6</p> <p>application [1] 2035/24</p> <p>applied [1] 1973/23</p> <p>apply [1] 2066/3</p> <p>applying [1] 2098/10</p>	<p>appreciate [1] 2121/4</p> <p>approach [1] 1942/13</p> <p>approached [2] 2022/3 2072/8</p> <p>approaching [1] 1983/7</p> <p>appropriate [2] 1936/13 2036/8</p> <p>approval [1] 1978/16</p> <p>April [38] 1945/6 1946/10 1946/18 1948/5 1948/16 1956/2 1956/20 1962/21 1967/15 1975/4 1976/4 1976/24 1980/3 1980/14 1980/21 1980/22 1980/24 1983/16 1983/22 1984/2 1993/19 1993/19 1993/20 1993/20 1999/12 2034/15 2034/18 2043/22 2083/14 2083/14 2083/19 2083/22 2097/18 2098/3 2100/7 2100/11 2100/15 2118/20</p> <p>April 10 [1] 1980/21</p> <p>April 10th [2] 1980/14 1993/20</p> <p>April 11 [2] 1948/16 1980/22</p> <p>April 11th [1] 1993/20</p> <p>April 12 [2] 2083/14 2100/15</p> <p>April 12th [1] 2100/11</p> <p>April 1st [2] 2097/18 2098/3</p> <p>April 2017 [6] 1956/20 1962/21 1976/4 2043/22 2083/22 2118/20</p> <p>April 27 [1] 1980/24</p> <p>April 3rd [2] 1945/6 1983/16</p> <p>April 4 [1] 1975/4</p> <p>April 4th [2] 1946/10 1983/22</p> <p>April 5 [1] 2083/14</p> <p>April 5th [4] 1946/18 1984/2 1993/19 2083/19</p> <p>April 6 [3] 1976/24 2034/15 2034/18</p> <p>April 6th [2] 1948/5 1993/19</p> <p>April 7 [1] 2100/7</p> <p>area [2] 2062/24 2100/4</p> <p>ARFA [23] 1933/16 1935/11 1937/10 1937/12 1937/21 1989/15 1991/5 1997/14 1998/13 1999/14 1999/21 2000/11 2000/25 2007/2 2008/21 2010/15 2024/23 2028/10 2031/9 2031/13 2044/15 2045/11 2123/4</p> <p>Arfa's [1] 2027/20</p> <p>argue [5] 2042/6 2076/11 2101/1 2102/2 2102/20</p> <p>argued [5] 1997/15 1998/13 2031/10 2040/5 2040/5</p> <p>argues [6] 2016/15 2029/15 2034/7 2034/23 2042/5 2042/17</p> <p>arguing [1] 2102/1</p> <p>argument [31] 1937/4 1966/4 1966/8 1967/5 1967/6 2022/17 2027/22 2028/2 2028/12 2031/12 2031/15 2041/8 2043/7 2047/21 2047/22 2051/11 2065/18 2069/6 2076/9 2079/15 2082/8 2093/7 2094/6 2095/10 2096/19 2101/10 2103/1 2115/4 2115/7 2117/12 2119/1</p> <p>arguments [6] 2019/23 2031/9 2049/5 2109/9 2112/20 2116/8</p> <p>arm [2] 1942/23 1942/23</p> <p>armed [1] 1948/25</p> <p>ARMSTRONG [1] 1933/22</p> <p>arranged [1] 1969/9</p> <p>arrangement [1] 1935/23</p> <p>arrangements [2] 1936/13 2097/23</p> <p>arrest [10] 1941/23 1956/12 1957/5 1960/19 1974/6 1983/3 1983/11</p>
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<p>A</p> <p>arrest... [3] 1984/9 2084/17 2111/12 arrested [7] 2019/5 2025/18 2046/17 2087/6 2110/21 2111/25 2114/15 arrival [1] 1962/1 arrive [3] 2006/22 2103/24 2114/12 arrived [5] 1946/18 1947/19 1948/6 1955/19 1984/3 article [7] 1941/21 1975/24 1975/25 1976/2 2013/23 2020/3 2020/5 ASAP [1] 1976/22 ascertain [1] 2035/14 ashamed [1] 2061/3 ASHLEY [1] 1933/16 aside [3] 1998/9 2032/8 2038/19 assets [11] 1994/20 1995/19 2002/9 2005/4 2026/6 2026/8 2027/1 2035/14 2035/15 2035/16 2072/13 assist [6] 1992/7 2069/12 2069/15 2071/22 2076/19 2080/4 Assistant [2] 1933/17 2033/12 assisting [1] 2073/22 associated [3] 2037/6 2052/11 2052/14 association [1] 2037/7 assume [2] 1935/9 2070/24 assuming [4] 1934/15 1935/4 2042/14 2120/9 assumption [3] 2057/11 2057/13 2096/1 attache [1] 1966/19 attempted [2] 1954/11 2038/4 attention [10] 1939/23 1951/9 2064/5 2069/25 2071/3 2089/9 2099/1 2109/12 2109/16 2115/25 Attorney Shi [2] 2096/21 2096/24 attorney-client [1] 2096/14 attributed [1] 2025/22 audio [1] 2006/3 audit [4] 2035/5 2035/8 2036/5 2036/6 audited [1] 2035/7 August [1] 1969/25 August 2016 [1] 1969/25 author [1] 2043/13 authorities [2] 2019/7 2045/5 authorized [1] 1978/16 automatically [2] 2070/25 2096/2 AUTUMN [1] 1933/18 AVERY [1] 1933/22 avoid [1] 2047/13 avoidance [3] 1984/23 1984/24 2115/10 award [1] 1973/22 aware [6] 1985/23 2058/7 2071/12 2091/9 2091/10 2096/6</p>	<p>balance [1] 2030/13 banged [1] 1985/15 banging [2] 1989/2 2067/15 bank [7] 2002/8 2002/8 2026/7 2026/17 2028/22 2030/4 2113/6 based [8] 2000/7 2005/10 2010/10 2012/13 2020/19 2020/21 2042/16 2047/6 basic [2] 1941/20 2031/15 basis [1] 2033/9 bear [2] 2069/22 2073/18 bearing [1] 2056/7 bears [2] 2044/13 2071/6 became [5] 1943/11 1965/13 1970/11 2046/5 2091/10 becomes [1] 2020/5 beep [1] 2017/11 beforehand [1] 2116/2 began [6] 1939/13 1942/2 1942/12 1943/7 1946/10 2071/21 beginning [12] 1941/16 1941/19 1962/19 1991/18 2000/18 2048/12 2065/3 2065/4 2081/21 2082/10 2084/4 2087/8 begun [1] 2046/6 behalf [9] 1997/14 2002/6 2005/17 2067/8 2069/6 2069/7 2079/10 2084/7 2117/6 belabor [1] 2104/8 belied [1] 2117/25 belief [2] 1966/5 2089/21 bell [1] 2115/14 belong [1] 2002/3 belonged [1] 1976/19 belongs [2] 1970/17 2052/22 benefiting [1] 1950/3 beseech [1] 2000/5 beside [1] 2069/16 best [9] 1934/18 1991/8 1991/15 2006/5 2048/6 2050/9 2112/2 2113/25 2115/13 bet [1] 2061/5 beyond [20] 1940/11 1953/13 1987/19 2014/15 2015/24 2016/13 2027/22 2031/5 2032/16 2036/18 2037/17 2037/22 2040/19 2054/23 2062/16 2071/7 2071/11 2095/24 2098/22 2103/18 big [5] 1993/7 2028/13 2064/6 2091/1 2091/2 bill [1] 2030/20 birth [5] 1941/9 1978/3 2088/20 2089/4 2089/6 bit [19] 1974/19 1992/12 1993/1 2000/8 2002/1 2002/4 2002/6 2006/12 2016/3 2017/16 2017/23 2024/11 2024/11 2024/19 2034/12 2048/17 2063/24 2065/20 2108/3 blame [3] 2033/11 2089/5 2106/5 blaming [1] 2033/17 blank [1] 2073/24 Bless [1] 1941/25 blow [1] 1995/1 blue [1] 1994/7 board [3] 1938/5 1952/22 2104/16 boils [1] 1982/13 bonds [1] 2026/9 book [1] 2100/11</p>	<p>booked [2] 2101/8 2101/19 Border [1] 2100/2 borders [1] 1956/23 born [1] 2029/25 boss [2] 2004/14 2065/24 bottom [5] 1940/5 1941/10 1982/4 2018/19 2062/22 bought [1] 2064/25 bound [1] 1977/8 bowl [1] 2064/6 box [4] 1948/10 2090/8 2090/8 2090/9 bracketed [2] 2120/5 2121/11 brackets [2] 2120/13 2120/23 brain [2] 1946/21 1959/20 bread [24] 1942/17 1942/20 1942/22 1943/11 1946/13 1969/16 1972/2 1980/6 1980/6 1980/9 1983/22 1996/4 1996/4 1996/7 1996/11 1999/12 1999/14 2009/2 2013/3 2013/7 2028/3 2037/8 2082/4 2082/22 break [13] 1989/17 1990/18 1990/20 1992/22 2023/10 2067/21 2091/14 2091/16 2091/18 2091/20 2093/9 2104/2 2119/3 breaking [1] 2012/25 BREON [1] 1933/13 bribes [1] 2094/22 Brickfield [1] 1992/14 brief [1] 2092/4 briefly [4] 1940/1 2027/17 2115/9 2116/8 brightest [1] 2050/9 bringing [3] 1945/7 1983/18 1987/24 broad [2] 1952/19 1962/2 broadly [1] 1982/11 Brooklyn [5] 1933/4 1933/15 1950/17 1960/13 2058/9 brought [5] 1957/3 1957/12 1967/16 2103/6 2117/15 Bruno [2] 2086/15 2086/21 bubble [1] 1940/24 buckets [1] 1953/4 buddy [1] 1977/23 build [1] 2043/17 built [1] 2000/13 burden [19] 1937/9 2043/18 2054/3 2054/5 2054/6 2054/10 2054/21 2054/22 2071/6 2071/11 2071/16 2089/15 2095/20 2096/4 2102/23 2104/24 2105/4 2113/16 2113/16 Bureau [2] 1970/5 1974/6 burgers [1] 2030/15 burn [2] 2027/15 2058/3 business [27] 1979/15 1980/2 1980/8 1980/13 1981/8 1981/13 1982/14 1982/18 1982/22 1994/4 2027/14 2029/2 2029/4 2029/11 2029/13 2031/16 2053/7 2053/8 2064/1 2077/16 2080/17 2081/11 2081/12 2083/23 2089/13 2106/6 2106/16 busy [1] 1964/3 bye [1] 2059/17</p> <p>C</p> <p>C-A-I-R [1] 2035/6 Cadman [1] 1933/14 CAIR [4] 1976/17 2035/6 2035/6 2035/23</p>
<p>B</p> <p>backdrop [1] 1985/7 background [6] 2026/20 2090/24 2091/3 2091/4 2091/6 2101/14 backtrack [1] 2110/12 backwards [1] 2064/16 backyard [1] 1950/24 bad [5] 2031/5 2063/23 2064/11 2106/3 2113/7 badly [1] 1951/7 bag [1] 2058/19 bagels [1] 2030/15 bait [1] 1948/2</p>		

<p>C</p> <p>calculate [1] 2031/25</p> <p>California [7] 2042/19 2048/20 2049/19 2052/22 2053/6 2060/10 2099/4</p> <p>camera [1] 2114/20</p> <p>cameras [1] 2013/3</p> <p>campaign [18] 1939/5 1939/10 1940/17 1944/25 1945/12 1949/5 1957/4 1958/15 1958/17 1963/5 1963/7 1963/8 1965/22 1965/25 1966/11 1976/13 2013/13 2118/23</p> <p>candidate [1] 1992/21</p> <p>candidly [1] 2028/10</p> <p>cannot [14] 1978/8 2006/23 2070/23 2075/10 2079/11 2089/5 2093/18 2096/22 2098/20 2098/20 2098/21 2101/15 2102/8 2115/11</p> <p>Canti [2] 2025/4 2030/7</p> <p>capable [2] 2010/14 2010/19</p> <p>captured [2] 1942/22 2102/9</p> <p>car [12] 1960/13 1976/25 2035/9 2035/14 2036/7 2036/12 2050/3 2050/3 2058/22 2060/11 2117/15 2117/16</p> <p>carbon [1] 2056/23</p> <p>card [8] 1941/10 1980/23 2030/19 2030/20 2030/21 2070/22 2089/14 2106/16</p> <p>career [2] 2020/23 2046/4</p> <p>careers [1] 2019/3</p> <p>careful [6] 2046/14 2054/17 2075/14 2076/12 2106/19 2109/16</p> <p>carefully [3] 2057/1 2062/10 2063/1</p> <p>cares [1] 2102/7</p> <p>carried [3] 1940/17 1955/4 2071/13</p> <p>carry [4] 1946/16 1955/25 2069/4 2105/19</p> <p>carrying [3] 1946/11 2014/14 2014/15</p> <p>case [69] 1939/16 1948/18 1979/8 1979/9 1981/2 1981/13 1982/4 1982/17 1982/20 1982/23 1989/18 1991/18 1991/19 1992/23 1993/23 2003/17 2009/11 2010/2 2010/3 2010/23 2010/24 2010/24 2010/25 2012/11 2013/23 2016/1 2016/10 2016/23 2017/1 2018/11 2020/3 2020/15 2022/19 2023/19 2029/8 2029/24 2031/24 2032/21 2037/1 2038/2 2038/15 2043/22 2045/19 2046/5 2047/14 2048/9 2048/16 2048/22 2053/14 2054/4 2054/4 2054/12 2058/15 2059/24 2062/17 2063/10 2063/18 2064/2 2064/19 2065/25 2066/3 2068/6 2068/24 2091/21 2103/22 2108/24 2112/17 2119/8 2119/10</p> <p>cases [4] 2036/3 2036/24 2048/24 2062/19</p> <p>cash [20] 1946/17 1980/4 1980/6 1980/7 1980/9 1980/12 1981/6 1982/7 2027/16 2027/18 2027/19 2027/20 2027/21 2027/23 2028/1 2028/3 2028/11 2028/13 2028/14 2028/15</p> <p>cast [1] 2052/5</p> <p>casual [1] 2098/11</p> <p>caught [6] 1975/11 2010/3 2010/3 2010/5 2100/21 2101/3</p> <p>caused [4] 1936/3 1954/11 2020/6</p>	<p>2038/3 5122</p> <p>causing [1] 1955/17</p> <p>caution [1] 2093/24</p> <p>CCP [1] 2105/10</p> <p>cell [13] 1994/14 1996/23 1999/4 2005/23 2016/24 2016/24 2016/25 2017/4 2017/6 2017/9 2052/5 2052/14 2057/20</p> <p>Central [1] 1974/4</p> <p>certain [3] 2031/16 2031/17 2063/6</p> <p>certainly [4] 1975/8 2005/23 2037/16 2057/1</p> <p>cetera [1] 2074/13</p> <p>Cewei [2] 1946/19 1947/13</p> <p>chain [1] 2096/24</p> <p>chains [1] 1994/5</p> <p>chambers [1] 2121/23</p> <p>chance [3] 1937/7 1993/1 2076/24</p> <p>change [1] 1934/24</p> <p>changing [2] 1974/21 1974/23</p> <p>Chaohang [1] 2052/22</p> <p>Chaohong [4] 2042/10 2042/11 2099/4 2116/1</p> <p>Chaohong Chen [2] 2042/10 2042/11</p> <p>charge [18] 1950/19 1954/2 1954/3 1954/15 1965/16 2008/7 2024/20 2033/13 2037/19 2053/25 2054/6 2059/14 2062/7 2062/25 2063/11 2068/19 2068/23 2114/21</p> <p>charged [11] 1939/21 1968/10 2020/9 2032/16 2032/17 2032/18 2037/24 2070/7 2100/21 2109/20 2112/22</p> <p>charges [9] 1940/9 1940/10 1940/11 1953/14 1953/20 1953/24 1964/7 1987/19 2037/18</p> <p>chart [12] 1973/4 1974/1 1974/24 1996/15 1996/17 2003/24 2032/24 2045/9 2083/18 2087/21 2088/2 2101/7</p> <p>charts [4] 2033/1 2082/17 2087/17 2087/17</p> <p>chats [1] 2016/11</p> <p>cheated [1] 2106/25</p> <p>check [18] 1969/11 1976/22 1979/12 1979/13 1979/15 1981/6 1982/6 1993/2 1993/3 1993/4 1993/5 1995/16 2002/8 2005/2 2028/14 2090/24 2091/4 2091/4</p> <p>checked [1] 1939/2</p> <p>checking [7] 1980/1 1980/16 1980/19 1981/1 1981/9 1981/9 2115/19</p> <p>checks [1] 2002/8</p> <p>CHEN [55] 1933/9 1933/16 1939/23 1953/15 1953/17 1954/15 1964/12 1964/21 1965/1 1965/7 1966/16 1968/4 1984/21 1984/24 2000/10 2011/3 2011/23 2012/12 2019/16 2037/6 2037/20 2042/10 2042/11 2048/19 2048/20 2048/20 2049/19 2052/22 2053/3 2053/3 2053/3 2053/6 2053/23 2053/25 2054/13 2054/15 2054/25 2055/7 2055/20 2057/19 2058/8 2059/11 2060/8 2062/7 2063/18 2065/6 2065/7 2065/14 2065/25 2066/10 2066/11 2066/11 2070/2 2099/4 2116/1</p> <p>Chen Chaohang [1] 2052/22</p> <p>Chen Chaohong [1] 2099/4</p>	<p>Chen's [3] 1953/18 2024/10 2060/9</p> <p>chief [3] 1966/13 2064/19 2064/21</p> <p>child [1] 1938/21</p> <p>child's [1] 2028/17</p> <p>children [3] 1951/3 1968/2 1986/14</p> <p>China [160] 1938/3 1938/10 1938/13 1938/14 1938/16 1938/20 1938/24 1939/7 1940/19 1941/1 1941/24 1942/15 1943/2 1943/6 1944/3 1944/7 1945/1 1945/7 1945/8 1945/25 1946/24 1947/4 1947/5 1947/8 1947/12 1948/15 1949/2 1949/8 1949/22 1951/2 1952/3 1952/7 1952/11 1952/20 1952/25 1955/11 1955/12 1955/22 1956/6 1956/14 1957/9 1957/13 1958/3 1959/16 1960/2 1960/5 1962/21 1963/17 1969/8 1969/21 1971/13 1972/12 1973/12 1974/16 1975/5 1975/24 1976/4 1978/6 1979/19 1979/22 1979/22 1981/7 1983/4 1983/10 1983/18 1984/11 1984/17 1987/6 1987/15 1987/25 1988/8 1989/7 1995/23 1997/9 1997/13 1997/18 1997/23 1997/24 1997/25 1998/1 1998/4 1998/6 1998/8 1998/16 1999/22 2003/10 2003/16 2003/21 2004/13 2005/9 2005/17 2009/13 2010/18 2011/1 2011/7 2011/15 2011/17 2011/19 2012/20 2012/24 2013/23 2013/24 2018/3 2018/9 2019/2 2019/19 2020/1 2020/3 2020/7 2020/23 2022/4 2025/1 2026/17 2030/25 2031/3 2031/6 2044/17 2045/18 2045/19 2046/9 2047/8 2056/10 2056/12 2056/13 2056/18 2056/19 2060/16 2070/16 2070/16 2071/9 2071/22 2072/8 2073/4 2075/7 2075/20 2076/3 2079/11 2081/7 2082/3 2083/20 2083/20 2086/22 2089/21 2099/10 2100/6 2100/23 2101/8 2101/20 2101/21 2101/23 2102/20 2105/3 2110/10 2110/19 2110/22 2111/17 2111/18 2116/18 2117/16 2118/2</p> <p>Chinese [247]</p> <p>Chinese-speaking [1] 1992/7</p> <p>choice [3] 2108/19 2109/1 2109/1</p> <p>choices [2] 2108/18 2109/6</p> <p>chose [1] 2001/5</p> <p>circle [5] 2009/19 2009/19 2010/1 2083/23 2100/19</p> <p>circumstances [5] 2063/14 2063/16 2099/9 2115/13 2115/18</p> <p>circumstantial [18] 1997/19 2011/20 2011/21 2011/23 2011/25 2012/6 2012/9 2012/21 2013/14 2015/18 2018/5 2019/20 2019/24 2024/13 2024/17 2047/9 2110/1 2110/5</p> <p>citizen [1] 2070/22</p> <p>citizens [3] 1987/4 2022/14 2105/23</p> <p>City [1] 2046/4</p> <p>civil [4] 2023/4 2062/17 2062/19 2111/11</p> <p>claim [3] 2110/5 2113/2 2113/4</p> <p>claimed [1] 1960/19</p> <p>clarification [1] 2086/3</p> <p>clarified [1] 1947/6</p>
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<p>C</p> <p>clarify [3] 1984/7 2073/15 2109/10</p> <p>clarifying [1] 2026/16</p> <p>clean [1] 1935/22</p> <p>clear [32] 1941/21 1948/20 1952/18 1953/24 1959/3 1960/2 1960/12 1963/4 1978/7 1978/22 1985/20 1986/10 1992/19 2005/13 2009/15 2026/4 2026/19 2027/19 2033/15 2034/20 2044/16 2049/11 2058/16 2068/14 2070/1 2073/21 2074/25 2087/13 2098/18 2107/9 2112/14 2115/14</p> <p>clear-cut [1] 1960/12</p> <p>clearly [23] 1946/8 1946/8 1955/14 1956/24 1983/19 1983/20 1984/1 2008/21 2008/22 2037/14 2055/17 2057/10 2063/13 2074/24 2083/9 2083/22 2087/17 2088/5 2094/6 2095/5 2099/8 2102/2 2110/7</p> <p>clerk [2] 2120/2 2121/12</p> <p>client [50] 1974/25 1975/3 1975/4 1991/14 2026/2 2040/1 2048/17 2048/22 2049/15 2049/19 2049/22 2052/19 2053/2 2053/4 2053/4 2053/10 2053/12 2054/9 2054/14 2055/2 2055/8 2055/18 2055/23 2056/1 2056/7 2057/1 2057/4 2057/9 2057/24 2058/8 2058/8 2058/10 2058/11 2059/11 2065/15 2067/3 2067/7 2067/11 2069/7 2069/25 2070/3 2073/22 2075/8 2075/19 2095/8 2096/14 2098/23 2099/1 2100/3 2107/10</p> <p>client's [5] 2050/3 2051/8 2052/24 2073/22 2107/9</p> <p>clients [5] 1974/20 1975/6 1978/6 1993/8 2069/7</p> <p>clip [1] 1961/9</p> <p>close [6] 1962/11 2030/23 2038/6 2071/3 2109/12 2115/11</p> <p>closed [2] 2115/13 2116/4</p> <p>closely [1] 1940/4</p> <p>closing [6] 1937/16 1984/25 2046/20 2067/21 2069/6 2069/20</p> <p>co [9] 1940/17 1942/14 1945/9 1945/13 1957/6 1958/16 1967/20 1967/22 1970/13</p> <p>co-conspirator [2] 1942/14 1945/9</p> <p>co-conspirator's [1] 1970/13</p> <p>co-conspirators [6] 1940/17 1945/13 1957/6 1958/16 1967/20 1967/22</p> <p>coconspirators [5] 1981/4 2120/15 2120/24 2121/6 2121/20</p> <p>code [4] 2000/3 2000/4 2050/19 2120/6</p> <p>coded [1] 1984/5</p> <p>coerce [5] 1940/18 1948/14 1952/20 1955/12 1956/6</p> <p>coincidence [5] 1981/12 2091/7 2094/7 2118/21 2118/25</p> <p>collapse [1] 1963/13</p> <p>collapsing [1] 1963/13</p> <p>colleague [3] 2041/12 2112/22 2115/9</p> <p>colleagues [1] 1991/6</p> <p>collect [5] 1976/12 1992/7 1994/22 2104/17 2117/22</p> <p>collected [2] 1976/6 1976/13</p> <p>collecting [2] 1976/7 2117/24</p>	<p>collection [1] 2108/17</p> <p>collections [1] 2099/7</p> <p>college [3] 1943/16 1976/10 1976/11</p> <p>college-aged [2] 1943/16 1976/10</p> <p>combined [1] 1982/22</p> <p>coming [8] 1936/4 1971/22 1981/23 1986/5 1999/13 2050/24 2100/23 2104/13</p> <p>commerce [3] 1954/6 2037/23 2037/25</p> <p>commissar [3] 1941/1 1966/13 1970/5</p> <p>commission [7] 1976/16 1977/18 1992/1 2004/15 2034/10 2035/2 2036/17</p> <p>commissioned [1] 1962/19</p> <p>commit [9] 1953/7 1953/9 1954/14 1954/18 1965/17 2059/6 2101/19 2113/6 2113/21</p> <p>commitments [1] 2108/7</p> <p>committed [6] 1953/3 1953/8 1965/14 2063/6 2069/2 2113/22</p> <p>Committee [2] 1974/5 2110/14</p> <p>committing [2] 2015/16 2070/8</p> <p>common [17] 1953/3 1953/22 1985/2 1989/11 2005/15 2012/13 2015/16 2019/14 2032/7 2033/7 2034/4 2072/12 2088/17 2109/15 2109/17 2112/15 2118/25</p> <p>communicate [3] 2076/20 2080/4 2081/17</p> <p>communicating [5] 2074/25 2081/22 2081/23 2094/19 2118/22</p> <p>communication [13] 1958/21 2020/15 2020/16 2075/7 2077/7 2080/2 2081/9 2082/16 2083/3 2083/5 2094/23 2096/13 2096/21</p> <p>communications [29] 2004/9 2040/16 2074/6 2074/24 2077/2 2077/2 2077/6 2077/21 2077/22 2078/4 2081/20 2082/10 2082/11 2082/19 2083/8 2087/24 2093/19 2094/13 2095/17 2095/19 2095/22 2097/7 2097/15 2098/11 2098/16 2098/17 2100/13 2102/10 2103/11</p> <p>Communist [4] 1962/9 2070/15 2070/18 2070/21</p> <p>company [30] 1995/11 1995/15 1997/9 2001/14 2001/15 2001/21 2002/3 2002/6 2002/10 2002/12 2002/13 2003/4 2003/10 2003/13 2003/14 2003/14 2003/16 2004/4 2004/10 2004/14 2004/25 2005/18 2026/7 2026/10 2040/25 2040/25 2041/2 2041/2 2090/24 2103/16</p> <p>compare [1] 2098/9</p> <p>comparison [3] 2097/6 2097/11 2098/18</p> <p>comparisons [1] 2099/11</p> <p>compartment [1] 2050/3</p> <p>compelling [2] 2087/17 2087/18</p> <p>compensated [1] 2084/15</p> <p>compensation [2] 1964/24 2098/4</p> <p>compiled [1] 2081/2</p> <p>complete [1] 2088/3</p> <p>completed [2] 2113/5 2114/3</p> <p>completely [6] 1976/7 2039/20 2042/16 2047/19 2111/1 2113/17</p> <p>complex [3] 2105/9 2106/1 2115/15</p> <p>complicated [2] 1994/14 2103/22</p>	<p>comprehend [1] 2115/16</p> <p>comprehensive [1] 2089/24</p> <p>computer [2] 1933/25 1936/10</p> <p>computer-aided [1] 1933/25</p> <p>conceal [2] 2016/18 2016/21</p> <p>concealing [2] 1981/19 1981/20</p> <p>conceded [3] 2038/9 2113/9 2116/6</p> <p>concept [2] 2121/1 2121/2</p> <p>concern [1] 2006/9</p> <p>concerned [5] 1951/8 1951/10 1959/22 1963/25 2067/11</p> <p>conclude [3] 1946/14 2037/17 2045/16</p> <p>conclusion [4] 2012/18 2091/23 2103/25 2109/18</p> <p>condemn [1] 1993/25</p> <p>condition [1] 1959/19</p> <p>conditions [2] 1959/22 1959/23</p> <p>conduct [8] 1939/12 1977/19 2019/10 2019/12 2035/2 2108/18 2108/21 2116/1</p> <p>conducted [6] 1967/14 1969/19 1972/9 1975/15 1988/5 1988/7</p> <p>conducting [5] 1942/3 1943/23 1976/8 1976/17 1977/12</p> <p>conduit [1] 1987/21</p> <p>confidence [1] 1977/17</p> <p>confirm [5] 1934/10 1939/4 2085/24 2114/3 2114/4</p> <p>confirmation [1] 2114/10</p> <p>confirmed [4] 1934/7 1942/18 1972/17 2070/14</p> <p>confirms [1] 2020/8</p> <p>confused [2] 1961/4 2110/24</p> <p>confusions [1] 2103/20</p> <p>Congying [17] 1939/9 1950/16 1951/5 1960/12 1960/15 1962/23 1966/25 1967/24 1984/20 1984/23 1985/5 1985/6 1986/11 1987/8 1988/23 1989/8 2111/13</p> <p>Congying Zheng [6] 1939/9 1950/16 1951/5 1987/8 1988/23 1989/8</p> <p>connection [5] 1945/12 1949/13 1979/7 2018/21 2035/8</p> <p>conscious [3] 1984/23 1984/24 2115/10</p> <p>consciousness [1] 2018/1</p> <p>consequences [2] 2025/9 2089/3</p> <p>consider [13] 1982/16 1991/9 1991/16 2000/6 2000/13 2011/24 2012/22 2033/8 2047/21 2066/16 2066/16 2100/18 2102/17</p> <p>consideration [2] 1984/22 2021/24</p> <p>considered [2] 2070/23 2088/6</p> <p>considering [3] 2000/10 2000/14 2067/4</p> <p>consistent [3] 1989/10 2026/1 2114/25</p> <p>conspiracies [6] 2063/2 2063/7 2063/9 2112/2 2112/23 2115/2</p> <p>conspiracy [38] 1952/23 1953/1 1954/14 1954/16 1954/22 1962/16 1964/5 1964/11 1987/12 2005/16 2008/16 2009/21 2011/5 2052/12 2052/15 2056/8 2059/7 2061/6 2063/5 2070/8 2081/4 2111/14 2112/7 2112/8 2112/17 2112/25 2112/25 2113/4 2113/11 2113/15 2114/10 2114/11 2116/15 2116/20 2117/10 2117/20 2118/13 2118/18</p>
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<p>C</p> <p>conspirator [2] 1942/14 1945/9 conspirator's [1] 1970/13 conspirators [10] 1940/17 1942/23 1944/22 1945/13 1947/21 1956/20 1957/6 1958/16 1967/20 1967/22 conspired [3] 1953/6 1953/9 1965/16 construction [1] 2030/18 consular [2] 1966/18 1966/23 consultation [1] 2096/11 consulted [1] 2096/21 contact [29] 1940/25 1970/12 2026/16 2058/7 2071/24 2079/10 2079/11 2081/7 2081/8 2081/19 2082/2 2084/5 2084/7 2087/9 2087/20 2088/4 2088/6 2088/7 2088/9 2088/10 2088/12 2088/24 2089/10 2090/23 2091/11 2096/8 2097/1 2098/12 2118/12 contacted [1] 1992/13 contacting [1] 1945/24 contacts [2] 1971/23 2077/25 contains [1] 2090/1 content [1] 1999/6 contention [1] 1996/18 contents [1] 1952/13 context [3] 2025/16 2027/8 2028/1 CONTI [4] 1933/18 1995/1 1999/5 2006/1 continuation [1] 2083/12 continue [10] 1949/4 1990/20 2024/7 2024/18 2043/8 2049/9 2051/21 2056/1 2076/12 2114/11 continued [17] 1949/6 1949/10 1951/22 1952/4 1970/19 1986/16 1988/13 2002/15 2022/21 2041/14 2050/4 2061/8 2079/21 2092/6 2101/11 2107/23 2114/12 continuing [12] 1949/17 1952/1 1971/1 1987/1 2003/1 2042/1 2062/1 2080/1 2093/1 2108/1 2114/9 2116/20 contract [2] 2077/24 2094/15 contractual [1] 1964/23 contrary [1] 2039/21 control [8] 1966/20 1967/1 2006/13 2006/15 2007/7 2008/9 2008/19 2071/13 controlled [3] 1978/10 2006/23 2070/20 controlling [1] 2070/18 convenience [1] 1981/19 conversation [5] 1943/4 1998/2 1999/21 2008/18 2011/14 conversations [8] 1998/12 1998/19 2011/17 2054/13 2055/6 2055/8 2059/12 2103/11 convert [1] 2074/21 convey [1] 1945/24 conveyed [3] 1943/25 2044/2 2044/8 convict [4] 2029/21 2040/20 2046/21 2115/1 convicted [2] 2037/21 2100/21 conviction [5] 2018/8 2046/24 2047/14 2051/24 2051/24 convince [6] 1948/25 1957/9 1983/4 2054/22 2099/18 2099/18 convinced [1] 2099/19 cooperating [1] 2019/8 cooperation [3] 2051/14 2051/16 2051/18</p>	<p>coordinated [1] 2059/5 cop [3] 1992/17 2010/22 2019/6 copies [1] 2056/23 cops [1] 2013/20 corner [2] 2082/14 2083/15 correct [10] 1935/6 1935/7 2006/10 2009/5 2021/11 2021/18 2036/14 2069/14 2097/21 2109/25 corresponded [1] 1996/20 corruption [2] 2013/25 2094/21 counsel [11] 2007/14 2073/22 2104/8 2109/5 2111/15 2112/24 2113/8 2115/3 2116/9 2117/9 2118/6 Counsels [1] 2069/5 count [28] 1954/3 1954/14 1954/17 1955/1 1955/2 1955/3 1962/13 1964/5 1964/9 1964/9 1964/11 1964/11 1964/13 1965/7 1965/18 1965/21 1968/8 1968/11 1968/21 1974/12 1984/19 1987/8 1987/16 2011/5 2011/5 2067/10 2119/25 2119/25 Count One [1] 2119/25 Count Three [1] 2119/25 counters [1] 1942/5 country [2] 2073/11 2105/24 counts [9] 1989/12 2036/20 2037/15 2055/4 2055/4 2056/6 2056/10 2067/9 2119/24 County [1] 1992/11 couple [9] 1980/20 1994/23 2020/7 2023/7 2025/3 2025/15 2091/15 2104/13 2119/2 course [14] 1948/13 1953/18 1954/10 1958/9 1959/3 1961/20 1962/15 1999/3 2008/14 2018/25 2025/25 2038/3 2081/24 2117/17 Court's [2] 2113/12 2113/13 courthouse [2] 1933/3 1992/11 courtroom [8] 1936/17 1989/23 1990/12 2024/4 2065/23 2092/1 2093/5 2105/9 cover [3] 1958/25 2073/1 2073/1 covered [2] 2096/14 2104/7 covert [6] 2039/4 2039/10 2039/10 2039/11 2040/4 2047/10 CR [1] 1933/2 CRAIG [1] 1933/15 creates [2] 1998/7 2019/19 credit [5] 1980/23 2030/19 2030/20 2030/21 2064/20 crew [1] 2083/20 crime [27] 1944/8 1953/7 1953/8 1953/10 1955/6 1965/20 1996/11 2015/16 2027/21 2037/9 2037/9 2037/9 2037/12 2050/20 2050/22 2059/7 2061/5 2061/5 2069/3 2070/8 2082/8 2101/19 2111/25 2113/21 2113/22 2113/24 2114/3 crimes [5] 1939/21 1953/4 1953/4 2044/17 2063/6 criminal [20] 1933/9 1992/12 1992/14 2010/25 2022/19 2023/4 2030/23 2036/23 2054/4 2058/1 2064/1 2066/10 2070/4 2091/5 2091/6 2110/3 2111/4 2112/6 2112/17 2113/15 criminality [2] 1996/9 2029/16 criminals [1] 2100/17 critical [10] 1955/19 1957/1 1957/3</p>	<p>2013/23 2015/25 2020/2 2020/5 2040/2 2109/14 2117/20 cross [2] 1998/25 2044/8 cross-examination [2] 1998/25 2044/8 crossing [1] 2108/25 crucial [2] 2093/12 2107/8 crumples [1] 2057/24 crying [2] 1939/1 1952/15 culture [1] 1983/7 Customs [1] 2100/2 cut [9] 1940/23 1960/12 2007/2 2007/3 2025/2 2081/14 2082/1 2082/5 2108/20</p> <p>D</p> <p>dai [8] 2055/12 2055/12 2055/15 2055/15 2055/16 2099/5 2099/5 2099/10 Daily [2] 1975/24 2020/3 danger [1] 1983/10 dangerous [3] 1938/15 1947/10 2100/14 data [12] 1978/7 1996/23 1999/4 2005/24 2016/25 2017/7 2074/9 2074/12 2074/20 2074/21 2081/1 2083/13 database [5] 1975/22 1977/6 1977/8 2034/19 2036/9 databases [3] 1956/16 1967/17 2034/19 date [8] 1978/3 1993/16 2082/9 2082/24 2083/25 2083/25 2084/1 2090/14 dates [1] 1941/10 daughter [21] 1938/16 1938/23 1939/2 1943/16 1944/15 1944/15 1947/12 1947/12 1947/14 1949/8 1949/14 1949/16 1949/25 1963/1 1963/24 1964/1 1964/2 1976/10 1989/6 2040/8 2042/19 daylight [1] 1962/2 DEA [5] 1977/24 2017/17 2017/18 2017/19 2033/14 deal [14] 1993/7 2016/23 2028/13 2035/15 2050/14 2050/14 2050/15 2050/17 2051/13 2051/13 2063/14 2063/16 2064/17 2081/15 deals [2] 2058/14 2063/1 dealt [1] 2056/10 debate [1] 2120/3 debt [9] 1976/7 1976/12 1992/7 1994/22 2071/23 2099/7 2106/17 2117/22 2117/25 deceit [2] 2010/19 2045/23 deceived [3] 2011/9 2024/15 2027/3 December [7] 1944/14 1968/7 1979/17 2004/19 2082/18 2083/8 2088/1 December 13 [1] 1979/17 December 2016 [2] 1944/14 2082/18 December 2019 [1] 1968/7 December 29 [1] 2083/8 December 4 [1] 2004/19 deception [1] 2028/5 deceptions [1] 2106/2 decide [2] 2018/6 2062/2 deciding [2] 2012/10 2065/24 deck [1] 1960/22 declare [2] 2032/12 2033/2</p>
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<p>D</p> <p>declared [3] 2031/17 2032/11 2032/14 decrease [1] 2087/23 decreases [1] 2082/12 deeply [1] 1952/15 defendant [47] 1933/18 1933/19 1933/21 1940/20 1940/20 1942/4 1942/24 1942/25 1949/21 1950/16 1950/19 1954/5 1954/7 1954/10 1954/20 1960/18 1961/24 1963/6 1964/14 1964/16 1964/18 1964/19 1965/3 1965/12 1968/9 1970/7 1981/4 1987/10 1987/12 1987/21 1988/3 1988/9 1988/11 1988/23 2011/4 2011/6 2037/23 2038/3 2061/3 2068/15 2069/5 2069/5 2070/5 2071/8 2071/12 2095/21 2113/17 Defendant Zheng [1] 1950/19 defendant's [4] 1940/13 1953/13 2072/13 2112/20 defendants [50] 1933/7 1935/4 1937/6 1938/4 1939/8 1939/11 1939/15 1939/21 1940/10 1940/16 1952/23 1952/25 1953/3 1953/5 1953/8 1953/21 1953/25 1955/1 1955/2 1955/7 1964/6 1964/7 1965/16 1965/17 1966/15 1966/22 1968/5 1968/13 1968/17 1968/21 1968/24 1968/25 1989/13 2068/7 2069/1 2074/5 2099/11 2099/12 2102/10 2104/18 2105/5 2108/17 2108/25 2109/9 2109/19 2109/21 2110/2 2112/1 2112/3 2112/9 Defendants' [1] 2072/24 defense [7] 1934/13 1966/6 1992/15 2007/14 2113/5 2120/9 2120/22 defies [1] 2118/25 defining [1] 2077/19 degrees [1] 1963/21 delete [2] 2016/10 2016/12 deliberate [9] 1939/24 1991/17 1996/10 2055/5 2066/24 2076/25 2086/24 2108/17 2109/11 deliberately [4] 1981/19 1981/20 1986/5 2115/11 deliberation [1] 2094/16 deliberations [4] 1937/19 1991/10 2079/7 2108/4 deliver [3] 1938/8 1950/18 2118/19 demands [1] 1945/25 demean [1] 2012/1 demonstrate [2] 1982/2 2074/15 demonstrated [2] 1962/14 2074/5 demonstrates [4] 1939/20 1984/14 2087/22 2117/23 demonstrating [1] 2071/16 demonstrative [5] 2018/16 2028/9 2031/14 2086/4 2086/7 denied [5] 1991/21 1994/16 1995/23 1996/12 1996/13 deny [2] 2107/2 2107/3 department [6] 1935/22 1956/17 1973/7 1974/4 1974/4 2050/7 departments [11] 1973/19 1973/21 1973/22 1973/23 1973/24 1973/25 1974/2 2015/1 2015/4 2110/14 2118/3 deposit [3] 1980/1 2003/3 2017/25 deposited [6] 1979/14 1979/25 1980/16</p>	<p>1981/7 1981/13 2058/9 depositing [3] 1981/16 2029/10 2029/14 deposits [4] 1980/19 1981/1 1982/14 2027/13 describe [2] 1963/10 1963/23 described [9] 1936/10 1952/17 1961/23 1963/20 1973/18 1985/13 2010/15 2017/7 2117/19 describes [1] 2045/11 description [1] 1979/23 descriptions [1] 1982/9 design [1] 2112/15 Despite [1] 1942/1 detail [5] 1969/6 1974/19 2001/10 2037/4 2119/22 detailed [10] 1943/4 1967/19 1988/14 2015/21 2015/24 2016/13 2016/18 2016/19 2117/6 2117/7 details [1] 2016/4 detective [33] 2008/5 2072/15 2076/20 2079/6 2080/7 2080/12 2081/5 2081/8 2082/3 2084/5 2084/9 2086/19 2088/13 2088/15 2088/25 2089/22 2090/21 2091/9 2093/21 2093/23 2094/5 2095/2 2095/7 2095/9 2095/13 2095/15 2095/18 2095/18 2096/3 2097/1 2097/2 2098/17 2106/5 Detective McMahon [8] 2080/7 2081/5 2081/8 2082/3 2088/15 2088/25 2090/21 2091/9 detector [1] 2006/22 determine [3] 2036/7 2069/1 2103/21 determined [1] 2055/19 DHS [3] 1978/7 1978/12 1978/16 die [3] 1944/10 1959/13 1959/14 Dietz [2] 2021/2 2021/5 difference [5] 2054/3 2062/16 2091/1 2091/2 2120/10 different [22] 1935/23 1938/3 1953/1 1953/2 1974/2 1975/5 1981/3 1981/5 1981/8 1982/5 1982/7 1982/8 2028/11 2030/3 2030/4 2031/14 2039/16 2051/4 2101/16 2101/17 2112/2 2112/5 differs [1] 2113/13 difficult [6] 1991/1 1991/12 1991/13 1997/3 2062/13 2115/15 difficulties [1] 2029/9 difficulty [1] 2029/18 diminishing [1] 2087/18 diplomatic [1] 1966/18 diplomats [1] 1966/22 direct [12] 1940/25 1948/16 1956/24 1997/17 2011/14 2011/25 2012/7 2024/12 2071/13 2073/7 2109/23 2110/2 directed [7] 1940/19 1946/6 1946/14 1965/23 1999/24 2112/5 2116/7 directing [3] 1942/12 2114/6 2118/23 direction [20] 1939/15 1943/7 1953/25 1965/2 1965/5 1965/10 1965/19 1966/20 1966/25 1967/9 1967/12 1967/18 1967/24 1968/6 1968/23 1969/4 2006/10 2010/2 2071/13 2085/6 directions [1] 2112/11 directly [9] 1943/8 1958/10 2039/8</p>	<p>2043/15 2081/15 2095/19 2116/20 2118/15 2120/8 director [4] 2022/3 2022/7 2022/8 2022/15 dirt [1] 2057/25 disagreement [1] 2120/21 disappear [2] 1944/8 1944/10 Discipline [1] 1974/5 disclosed [1] 2105/2 discloses [1] 2014/13 disconnected [1] 1963/18 discover [2] 2093/22 2094/7 discovered [1] 2102/6 discrete [1] 1962/15 discuss [5] 1941/18 1953/15 1965/21 2026/17 2053/13 discussed [8] 1945/14 1945/16 1946/4 1997/2 2009/9 2013/11 2025/13 2070/16 discussing [2] 1985/12 2003/6 discussion [6] 2002/7 2008/15 2017/15 2067/1 2109/22 2111/21 discussions [1] 2048/25 disguise [1] 2003/22 disparaging [1] 1950/5 dispenser [2] 1960/22 2057/4 display [2] 2072/18 2093/14 displayed [2] 2095/6 2099/23 displays [1] 2078/3 disposed [1] 1978/11 dispute [8] 1934/16 1940/13 1965/22 1966/15 1968/13 1968/17 1968/20 2009/15 disputed [7] 1994/2 1996/1 1997/6 1997/7 1997/11 2016/5 2034/13 disregard [3] 2047/19 2049/13 2049/13 dissected [1] 1993/24 distance [2] 1963/17 2009/8 distant [1] 1963/16 distress [8] 1954/12 1955/17 1959/4 1960/9 1961/21 2038/5 2038/23 2044/21 distressing [1] 1959/17 distributed [1] 1978/11 DISTRICT [5] 1933/1 1933/1 1933/10 1933/14 2021/3 DNA [1] 2051/2 docketed [1] 2122/1 doctor [3] 1945/20 1946/22 1959/12 document [13] 1941/16 2052/8 2052/25 2076/25 2077/1 2094/3 2095/4 2100/2 2103/1 2111/15 2111/16 2117/2 2121/15 documents [5] 1978/9 2018/20 2021/10 2021/18 2103/21 Doe [1] 2120/3 dog [1] 2069/10 DOJ [2] 2025/7 2025/11 dollar [1] 1980/9 dollars [2] 1980/17 2098/5 done [16] 1934/8 1934/9 1959/19 1959/25 1987/20 2019/15 2024/20 2030/1 2036/5 2046/15 2055/13 2066/14 2074/2 2074/6 2081/2 2116/13 door [36] 1936/20 1936/22 1938/18 1938/18 1947/22 1950/20 1950/20 1950/21 1950/22 1951/9 1951/13</p>
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<p>D</p> <p>door... 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[1] 2050/3</p> <p>driver [1] 1945/11</p> <p>driver's [1] 1995/6</p> <p>drives [3] 2058/10 2058/22 2060/12</p> <p>driveway [4] 1950/20 1960/20 2117/15 2117/16</p> <p>driving [2] 2053/12 2084/15</p> <p>dropped [1] 1947/20</p> <p>drove [3] 1950/17 1960/12 2111/23</p> <p>Drug [1] 1977/24</p> <p>DSS [1] 1966/21</p> <p>due [2] 2030/20 2066/6</p> <p>dumb [1] 2097/23</p> <p>Dunkin [1] 2030/16</p> <p>duty [1] 2047/20</p> <p>DVD [1] 1952/14</p>	<p>E</p> <p>e-mail [29] 1942/9 1971/8 1971/24 1974/25 1975/12 1975/13 1975/15 1975/20 1979/3 1995/12 1997/23 2000/2 2000/20 2073/2 2073/2 2073/5 2073/9 2073/9 2073/13 2073/13 2074/11 2075/6 2077/6 2100/12 2116/24 2118/9 2118/19 2121/23 2121/24</p> <p>e-mailed [1] 1949/11</p> <p>e-mails [3] 2000/17 2074/24 2116/25</p> <p>early [5] 1942/2 1956/3 1969/25 2025/17 2025/18</p> <p>earned [3] 1982/3 1982/17 1982/20</p> <p>earnings [2] 1982/21 1982/23</p> <p>easily [3] 1958/2 2029/2 2105/25</p> <p>East [1] 1933/14</p> <p>EASTERN [3] 1933/1 1933/14 2021/3</p> <p>easy [1] 2067/18</p> <p>eat [1] 1963/14</p> <p>effect [3] 2017/7 2022/4 2022/9</p> <p>effectively [1] 2116/6</p> <p>effort [8] 1949/24 1961/11 1971/13 1986/1 1997/12 2000/21 2031/11 2037/3</p> <p>efforts [6] 1942/12 1949/9 1952/4 1952/10 2037/11 2113/18</p> <p>eight [3] 1995/16 2004/17 2005/1</p> <p>either [14] 1934/23 1944/7 1954/13 1995/23 2008/16 2020/22 2021/1 2044/12 2054/25 2055/8 2056/7 2056/9 2091/9 2099/19</p> <p>elderly [5] 1938/12 1944/23 1945/21 1948/23 1959/9</p> <p>element [6] 1959/8 1960/14 1961/18 1968/11 1968/12 2038/17</p> <p>elements [7] 1954/3 1954/16 1954/25 1962/14 1964/13 1965/8 2038/6</p> <p>elicited [1] 2007/11</p> <p>eliminated [1] 2083/10</p> <p>ELMO [1] 2072/22</p> <p>elsewhere [1] 2026/11</p> <p>email [12] 1933/23 1954/24 1970/8 1970/9 1970/10 1970/16 2004/12 2004/19 2033/18 2080/5 2080/6 2080/7</p> <p>emails [3] 2005/11 2010/9 2011/17</p> <p>Embassy [4] 1996/24 1999/24 2005/22 2009/20</p> <p>embezzled [2] 1995/20 2027/1</p> <p>embezzlement [4] 1997/10 2013/24 2020/9 2094/21</p> <p>Emily [3] 2080/2 2080/2 2081/2</p> <p>Emily Hsu [3] 2080/2 2080/2 2081/2</p> <p>emitting [1] 2017/11</p> <p>emoji [3] 1939/4 1963/24 1964/3</p> <p>emotional [8] 1954/12 1955/17 1959/4 1960/9 1961/21 2038/5 2038/23 2044/21</p> <p>emotionally [1] 2010/17</p> <p>emphasize [1] 2069/2</p> <p>emphatic [1] 1946/6</p> <p>employed [1] 2048/21</p> <p>employee [1] 1965/4</p> <p>encountered [1] 2007/20</p> <p>encourage [1] 2110/11</p> <p>enforcement [7] 1943/22 1975/9 1977/24 2014/2 2017/13 2017/14 2025/21</p> <p>engage [4] 1956/24 1962/16 1964/5 2070/10</p> <p>engaged [3] 1955/9 1957/1 2118/7</p> <p>engaging [1] 2068/23</p> <p>engender [1] 2046/24</p> <p>English [3] 2013/11 2075/24 2081/1</p> <p>ensure [3] 1945/21 1946/15 1957/3</p> <p>enter [2] 1989/10 1989/12</p> <p>entered [1] 1970/16</p> <p>entering [1] 2100/23</p> <p>enters [4] 1936/17 1990/12 2024/4 2093/5</p> <p>entire [7] 1959/6 1959/17 1960/24 1968/9 2020/23 2039/4 2088/13</p> <p>entirely [2] 2026/1 2118/21</p> <p>entity [3] 1973/3 1973/7 1973/8</p>	<p>entries [1] 2083/7</p> <p>Entry [1] 1971/16</p> <p>Eric [37] 1943/8 1957/16 1975/3 1979/23 1995/12 2003/16 2003/18 2003/19 2003/23 2004/6 2004/9 2004/12 2004/13 2004/19 2013/20 2015/7 2015/14 2020/25 2026/13 2026/19 2027/19 2032/6 2039/11 2043/16 2082/1 2084/13 2087/20 2089/11 2089/16 2089/19 2093/20 2093/25 2094/1 2098/16 2104/25 2105/1 2110/25</p> <p>Eric Gallowitz [6] 2027/19 2032/6 2039/11 2093/20 2093/25 2094/1</p> <p>Eric Yan [12] 1943/8 1995/12 2026/13 2043/16 2082/1 2084/13 2087/20 2089/11 2089/16 2089/19 2098/16 2105/1</p> <p>Eric's [1] 1975/4</p> <p>escalated [4] 1942/12 1944/21 1950/12 1958/1</p> <p>escalating [1] 1962/5</p> <p>escalation [1] 1963/4</p> <p>ESQ [9] 1933/13 1933/15 1933/16 1933/16 1933/18 1933/18 1933/19 1933/20 1933/21</p> <p>essence [1] 1999/22</p> <p>essential [1] 2117/20</p> <p>essentially [8] 1965/3 1974/7 2045/3 2070/19 2112/4 2112/5 2113/8 2115/6</p> <p>established [2] 2012/14 2012/17</p> <p>estimate [1] 2104/2</p> <p>et [2] 1933/6 2074/13</p> <p>et cetera [1] 2074/13</p> <p>etc [1] 2080/9</p> <p>evacuate [2] 2105/22 2105/24</p> <p>evaluate [1] 2027/8</p> <p>evasion [1] 2032/17</p> <p>eve [1] 1978/6</p> <p>evening [1] 1937/1</p> <p>event [2] 1993/10 2099/1</p> <p>events [6] 1940/6 1940/8 1940/9 1952/17 2025/19 2089/3</p> <p>eventually [6] 1978/20 2049/23 2050/5 2050/5 2050/15 2050/23</p> <p>everyday [3] 2029/19 2030/14 2036/25</p> <p>evidence [221]</p> <p>evidently [1] 2056/23</p> <p>evil [1] 2029/15</p> <p>exact [4] 1985/18 2016/20 2028/20 2028/22</p> <p>exactly [34] 1939/17 1941/19 1941/22 1943/25 1953/23 1960/25 1968/25 1971/3 1972/14 1974/8 1977/14 1983/1 1984/8 1984/14 1984/15 1985/11 1985/22 1987/20 1988/10 1988/22 1989/8 1994/1 2005/13 2014/5 2014/23 2016/14 2019/9 2020/10 2023/3 2035/13 2036/12 2040/14 2058/1 2098/1</p> <p>examination [2] 1998/25 2044/8</p> <p>examinations [1] 1935/2</p> <p>examine [3] 2037/3 2053/16 2053/16</p> <p>examined [1] 2021/18</p> <p>example [12] 1943/14 1976/9 2016/25 2018/22 2021/1 2026/4 2032/6 2036/24 2045/22 2048/6 2097/24 2113/19</p>
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<p>E</p> <p>examples [1] 2036/21 exception [2] 1996/21 1996/22 exchange [5] 1976/21 1984/6 2001/19 2007/13 2096/3 exchanges [1] 2015/6 excuse [3] 1967/21 2054/14 2115/22 executed [1] 2044/19 exemplar [2] 2051/6 2051/7 exhibit [76] 1940/3 1940/4 1942/19 1970/8 1976/19 1992/25 1994/24 1995/7 1996/7 1998/21 1998/22 1998/23 2000/24 2001/18 2001/19 2002/1 2002/2 2002/11 2003/3 2003/12 2003/15 2004/11 2004/18 2004/24 2005/6 2013/8 2014/10 2014/17 2015/2 2015/10 2015/25 2018/16 2020/4 2026/5 2026/12 2029/8 2030/8 2030/8 2031/13 2034/16 2035/17 2035/17 2036/11 2042/24 2043/12 2052/13 2052/25 2069/23 2072/23 2072/24 2076/23 2077/1 2078/2 2078/5 2079/19 2080/1 2080/6 2080/19 2082/7 2082/12 2082/13 2082/13 2083/11 2083/12 2085/8 2085/8 2089/23 2093/11 2093/13 2093/18 2094/10 2097/10 2097/12 2098/3 2099/20 2099/21 Exhibit 0402U [1] 2099/21 Exhibit 0807F [1] 2097/12 Exhibit 0812C [1] 2098/3 Exhibit 0901-D [2] 2076/23 2077/1 Exhibit 103-A [1] 2013/8 Exhibit 107 [1] 2043/12 Exhibit 3007 [1] 2079/19 Exhibit 3034 [1] 2015/25 Exhibit 3047 [1] 2004/11 Exhibit 3056 [1] 2004/18 Exhibit 3061 [1] 2029/8 Exhibit 314 [1] 2015/2 Exhibit 317 [1] 1998/23 Exhibit 4004 [1] 2094/10 Exhibit 4019-B [1] 2015/10 Exhibit 4019B [1] 2093/13 Exhibit 403-A [1] 2005/6 Exhibit 407 [1] 2014/10 Exhibit 408-H [1] 2034/16 Exhibit 408-I [1] 2035/17 Exhibit 410 [1] 2014/17 Exhibit 434 [1] 2020/4 Exhibit 452 [1] 2031/13 Exhibit 805-B [4] 2003/3 2003/12 2003/15 2036/11 Exhibit 805B [3] 2001/19 2002/2 2002/11 Exhibit first [1] 1998/21 exhibits [12] 1934/7 1934/9 1934/12 1935/16 1935/25 1936/5 1937/14 1944/18 1945/5 1950/25 1994/23 2067/6 exist [1] 2075/11 existence [1] 2012/14 exists [1] 2112/17 Exit [1] 1971/16 exits [4] 1989/23 2023/23 2092/1 2119/16 expect [14] 1953/15 1954/15 1959/6 1961/21 1964/12 1964/21 1965/1</p>	<p>1965/7 1966/16 1968/4 1979/19 1984/21 2112/15 2113/19 expectation [3] 1959/4 1961/14 1961/20 expected [3] 1954/11 2038/4 2038/22 expenses [4] 2018/17 2018/20 2030/15 2032/6 experience [3] 1952/19 2012/13 2105/7 experienced [1] 2019/6 expert [5] 1999/3 2074/20 2082/15 2104/19 2105/15 experts [5] 2020/22 2051/2 2051/4 2074/13 2104/12 explain [3] 1939/20 1973/5 2021/20 explained [9] 1957/15 1962/4 1965/20 1983/6 2003/25 2035/8 2036/6 2070/15 2111/7 explains [1] 2035/23 explanation [2] 1974/24 1986/7 explicitly [2] 2072/7 2098/8 exploited [1] 1944/23 expression [2] 2055/12 2111/13 extent [2] 1937/15 1953/16 extra [1] 2045/25 extra-legal [1] 2045/25 extract [2] 2074/9 2074/20 extradition [1] 2045/24 extremely [1] 2113/16 eyes [4] 1984/25 2115/12 2115/14 2116/4</p> <p>F</p> <p>face [4] 1958/5 2039/10 2039/14 2044/17 Facebook [5] 1938/22 1950/1 1963/1 2043/11 2043/11 fact [44] 1947/12 1956/11 1959/10 1968/14 1982/16 1982/20 1989/4 1993/8 1996/6 1997/4 1998/17 2006/24 2010/10 2012/14 2013/19 2016/23 2024/15 2029/17 2032/19 2033/9 2034/2 2034/3 2034/11 2034/13 2035/21 2042/8 2043/9 2044/19 2047/9 2049/13 2050/4 2050/16 2066/16 2068/10 2069/25 2085/3 2085/5 2089/6 2101/6 2101/11 2101/15 2101/17 2112/17 2116/14 fact-findings [1] 1997/4 facts [18] 1991/19 1993/18 1994/17 2012/15 2012/17 2013/23 2044/23 2049/6 2049/8 2049/16 2066/3 2066/6 2066/8 2101/2 2101/13 2101/16 2103/19 2110/21 failed [2] 1964/16 2071/16 fair [6] 2030/23 2053/17 2057/11 2064/12 2105/4 2114/2 fairly [1] 2057/1 faith [1] 2113/17 fake [1] 2004/6 fall [3] 1953/4 2042/21 2043/4 false [1] 2032/17 falsely [2] 1960/19 2082/3 families [4] 1938/6 1954/13 1963/9 2088/21 family [36] 1938/10 1941/2 1942/4 1944/3 1944/5 1945/15 1950/5 1950/9 1959/17 1959/21 1960/3 1960/13 1960/24 1961/11 1962/6 1962/24</p>	<p>1963/18 1971/17 1983/6 1983/7 1983/8 1983/10 1988/15 2010/18 2010/19 2045/2 2045/18 2046/1 2059/23 2063/15 2073/22 2099/6 2100/24 2111/17 2113/23 2118/16 family's [1] 1961/16 famous [2] 2082/6 2082/7 Fang [33] 1937/25 1938/2 1938/6 1938/17 1939/2 1939/6 1943/5 1947/1 1951/14 1951/16 1952/3 1952/8 1952/18 1952/20 1952/24 1953/23 1954/9 1954/12 1957/7 1960/16 1961/22 1961/23 1963/20 1963/23 1965/23 1969/20 1976/3 1977/23 1987/14 1987/25 1988/19 1995/4 2026/22 Fang's [15] 1938/7 1938/23 1938/24 1943/15 1945/2 1947/9 1952/5 1952/8 1963/1 1972/10 1976/10 1985/14 1985/24 1986/12 1988/24 far [5] 1935/2 1948/7 2034/18 2045/19 2090/21 fashion [1] 2040/4 fate [1] 2106/23 father [42] 1938/12 1938/14 1944/23 1945/1 1945/3 1945/19 1945/22 1945/23 1946/3 1946/18 1946/19 1946/23 1947/2 1947/10 1947/13 1947/17 1947/20 1947/21 1947/24 1948/3 1948/5 1949/7 1955/11 1955/18 1956/5 1956/5 1956/23 1957/2 1957/8 1957/11 1959/5 1959/9 1959/11 1959/18 1960/1 1960/5 1962/20 1967/16 1983/3 1984/3 1984/5 2045/1 father's [1] 1959/16 favor [5] 2019/21 2055/20 2055/24 2056/20 2063/18 favorable [1] 2107/10 Fax [1] 1933/23 FBI [14] 2022/3 2022/8 2022/14 2049/25 2050/10 2050/20 2052/4 2057/19 2058/20 2084/18 2085/4 2086/15 2086/21 2100/10 FBI Agent Bruno [1] 2086/21 FBI's [1] 2087/5 fear [5] 1960/4 1961/15 1961/23 1962/5 2044/20 feared [1] 1947/11 federal [3] 1993/12 2050/18 2050/18 fee [5] 1969/12 1979/10 1979/11 1979/24 2096/11 feedback [1] 2081/18 feelings [2] 1962/8 1989/1 fees [1] 2018/13 fellow [3] 2093/20 2093/23 2111/2 felt [5] 1950/6 1951/6 1961/23 1962/9 2045/12 Feng [16] 1966/12 1975/5 1979/21 1980/10 1980/15 1983/17 1984/4 1984/13 1996/16 1996/22 2001/13 2005/7 2005/8 2005/11 2007/15 2101/9 Ferry [1] 2039/16 few [19] 1943/10 1949/21 1952/14 1971/23 1972/22 1998/14 2001/17 2015/21 2025/7 2037/18 2041/13 2044/23 2058/20 2069/9 2087/24</p>
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<p>F</p> <p>few... [4] 2104/10 2116/9 2117/13 2118/5</p> <p>figure [8] 1946/2 1986/4 2022/6 2065/13 2073/14 2105/5 2105/13 2106/3</p> <p>filing [1] 2032/17</p> <p>fill [1] 2006/5</p> <p>final [1] 2119/22</p> <p>finally [9] 1950/11 1955/19 2034/6 2043/19 2056/15 2056/21 2097/13 2114/15 2118/5</p> <p>finance [3] 2004/20 2005/11 2036/13</p> <p>financial [3] 1995/11 1995/15 2004/25</p> <p>financials [1] 1982/2</p> <p>findings [2] 1969/15 1997/4</p> <p>fine [9] 2069/12 2074/16 2090/6 2093/15 2094/11 2097/22 2099/22 2099/24 2121/25</p> <p>fingerprints [1] 2051/3</p> <p>finish [5] 2024/19 2046/20 2066/23 2085/2 2106/21</p> <p>finishes [1] 2119/11</p> <p>Finishing [1] 2104/3</p> <p>Finning [9] 1977/23 1978/21 1979/6 2017/16 2017/20 2033/12 2033/16 2033/20 2033/24</p> <p>firms [2] 2036/1 2036/3</p> <p>first [50] 1934/20 1941/11 1953/5 1954/2 1954/5 1959/24 1960/20 1960/21 1960/21 1962/12 1964/14 1965/9 1968/11 1971/5 1973/21 1974/20 1980/2 1991/4 1991/4 1995/16 1998/21 2000/22 2001/18 2001/25 2005/2 2008/8 2012/23 2013/1 2020/8 2025/15 2026/15 2030/10 2037/22 2038/8 2038/25 2044/4 2045/12 2046/5 2053/5 2055/4 2063/11 2063/12 2070/11 2073/1 2082/20 2090/11 2094/7 2095/5 2105/11 2116/10</p> <p>fish [1] 2064/6</p> <p>five [12] 1980/9 1993/15 1993/15 1993/23 2004/21 2005/5 2005/13 2047/11 2052/17 2060/24 2100/11 2101/23</p> <p>five-thousand-dollar [1] 1980/9</p> <p>fixing [1] 2079/1</p> <p>flag [2] 1975/7 1975/9</p> <p>flash [1] 1935/25</p> <p>flew [1] 1978/6</p> <p>flight [4] 2046/9 2100/11 2101/8 2101/20</p> <p>flood [1] 1938/24</p> <p>flown [2] 1957/8 1983/3</p> <p>fly [1] 1945/19</p> <p>focus [11] 1940/12 1969/23 1991/8 1998/13 2011/20 2054/19 2076/8 2076/12 2080/11 2086/14 2108/21</p> <p>focused [4] 1994/19 1994/21 2020/25 2080/10</p> <p>focusing [2] 2085/16 2109/11</p> <p>foil [1] 2017/10</p> <p>folks [5] 1935/3 1936/14 2023/24 2119/7 2120/25</p> <p>follow [9] 1935/1 1945/2 1953/18 1956/10 2006/10 2066/5 2066/19 2097/21 2113/13</p>	<p>followed [4] 1943/8 1948/4 1962/22 1978/4</p> <p>follower [1] 1960/19</p> <p>following [12] 1946/3 1951/22 1971/14 1980/17 1983/15 1984/2 2002/15 2041/14 2061/8 2087/19 2092/6 2107/23</p> <p>footage [1] 2114/20</p> <p>force [8] 1938/13 1941/23 1943/6 1952/10 1957/13 1971/13 1974/16 1984/17</p> <p>forced [7] 1946/21 1947/3 1948/23 1959/16 1959/23 1960/1 1962/20</p> <p>forcibly [1] 1967/16</p> <p>foreign [24] 1953/6 1954/6 1959/2 1961/18 1964/8 1964/10 1965/2 1965/4 1965/5 1966/17 1966/20 2016/7 2019/12 2037/10 2037/23 2052/15 2068/20 2069/3 2070/9 2071/5 2105/18 2105/18 2106/25 2107/2</p> <p>forever [1] 2063/24</p> <p>forgot [2] 2001/2 2097/16</p> <p>form [4] 2049/12 2055/14 2055/14 2116/24</p> <p>formal [1] 1964/23</p> <p>formats [1] 1981/6</p> <p>former [6] 1940/21 1992/14 1992/17 2013/20 2014/2 2062/20</p> <p>forth [15] 1955/22 1996/4 2011/5 2016/14 2018/23 2030/4 2042/4 2049/24 2052/7 2055/23 2063/15 2063/19 2100/6 2101/21 2101/22</p> <p>Forty [1] 2105/7</p> <p>forward [1] 1999/9</p> <p>FOUO [1] 1978/12</p> <p>four [15] 1939/21 1953/4 1953/14 1954/3 1972/11 1975/5 1981/3 1993/12 1993/19 2025/20 2025/20 2046/16 2060/24 2112/22 2116/17</p> <p>Fourth [1] 1964/19</p> <p>FOX [7] 1973/9 1973/11 1974/3 1974/8 1985/7 1985/8 2115/24</p> <p>Foxhound [1] 2088/8</p> <p>FOXHUNT [1] 2020/18</p> <p>fraud [1] 2036/2</p> <p>frequency [1] 2087/22</p> <p>frequently [2] 1971/25 1972/5</p> <p>friend [8] 1943/22 1975/4 1975/19 1978/22 2017/16 2033/18 2072/2 2110/25</p> <p>friends [5] 1938/23 1950/2 1950/4 1950/7 1963/17</p> <p>frightened [2] 1960/7 2045/10</p> <p>front [16] 1950/20 1950/20 1951/9 1951/13 1958/5 1960/21 1974/4 1985/16 1989/4 1993/11 1996/17 2001/16 2039/14 2050/5 2073/20 2114/21</p> <p>fugitive [2] 1972/19 1972/22</p> <p>fugitives [2] 1976/1 2021/9</p> <p>fulfill [1] 2018/7</p> <p>fully [3] 2019/8 2062/13 2071/12</p> <p>functions [1] 2100/8</p> <p>fundamental [1] 2007/8</p> <p>fundamentally [1] 2038/25</p> <p>funds [1] 2033/3</p> <p>furtherance [2] 1954/24 1965/14</p>	<p>G</p> <p>Gallowitz [19] 1957/16 1957/20 1957/22 1957/25 1975/20 1975/20 2008/15 2013/20 2015/7 2015/11 2021/1 2027/19 2032/6 2034/20 2039/11 2093/20 2093/25 2094/1 2111/1</p> <p>gangster [2] 2055/16 2115/6</p> <p>gangsters [1] 2063/19</p> <p>gap [1] 2095/23</p> <p>gather [2] 1937/10 1955/24</p> <p>gathered [2] 1945/13 1956/21</p> <p>gathering [2] 1943/24 1994/4</p> <p>geared [1] 1943/12</p> <p>gender [1] 2001/2</p> <p>general [6] 1964/17 1965/11 1968/14 1987/11 2068/21 2070/10</p> <p>generally [1] 1953/11</p> <p>generated [6] 2034/15 2034/16 2089/24 2090/12 2100/2 2120/10</p> <p>GENNA [1] 1933/18</p> <p>gentleman [2] 1975/12 2001/3</p> <p>gentlemen [52] 1936/25 1937/13 1939/13 1941/14 1952/17 1961/13 1966/4 1967/7 1971/9 1987/17 1989/16 1990/23 1993/22 1997/3 2010/21 2011/10 2019/14 2023/18 2024/6 2041/8 2047/18 2049/4 2051/11 2054/18 2065/18 2066/15 2066/21 2068/4 2069/24 2073/9 2074/4 2074/22 2075/15 2077/5 2080/12 2080/23 2086/7 2086/23 2088/16 2089/8 2090/20 2091/20 2093/10 2096/18 2097/5 2100/1 2102/22 2104/23 2106/11 2106/23 2108/2 2108/13</p> <p>girl [1] 1949/13</p> <p>given [12] 1946/23 1946/25 1947/4 1971/22 1974/20 1974/23 2010/8 2016/11 2084/21 2098/13 2099/8 2105/25</p> <p>glad [1] 1990/25</p> <p>global [2] 1976/1 2021/9</p> <p>glove [1] 2050/2</p> <p>gmail.com [2] 1933/23 2073/10</p> <p>goal [13] 1952/24 1953/3 1953/22 1956/5 1957/14 1958/2 1974/15 1987/13 1988/10 1988/22 1989/9 2110/3 2112/13</p> <p>GOLDBERGER [15] 1933/19 1934/24 1935/5 1991/7 2039/13 2041/12 2047/24 2049/9 2065/20 2066/14 2066/19 2067/19 2098/25 2099/3 2123/6</p> <p>gonna [2] 2003/6 2025/9</p> <p>Gonzalez [4] 1934/11 1935/23 1936/11 1936/19</p> <p>gov [1] 2073/12</p> <p>government [364]</p> <p>Government Exhibit 0316 [1] 2082/13</p> <p>Government Exhibit 0317 [1] 2083/12</p> <p>Government Exhibit 0902-F [1] 2082/7</p> <p>Government Exhibit 2029 [1] 2026/12</p> <p>Government Exhibit 307 [1] 2080/6</p> <p>Government Exhibit 4012 [1] 2089/23</p> <p>Government Exhibit 403-I [2] 2030/8 2030/8</p> <p>Government Exhibit 805-B 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2047/6 2054/9 2056/8 2056/9 2056/16 2064/2 2068/7 2068/19 2068/23 2099/12 2099/13 2099/14 2109/20 2113/7 2113/11 2114/23 2116/5</p> <p>gun [3] 2014/14 2093/25 2094/2</p> <p>guy [8] 2052/22 2055/22 2060/15 2060/16 2060/17 2060/25 2063/23 2090/16</p> <p>GX [27] 1941/6 1942/6 1942/19 1942/21 1942/24 1943/17 1944/18 1946/9 1948/11 1948/11 1948/19 1950/10 1950/25 1952/12 1957/10 1961/8 1970/7 1970/14 1971/8 1976/3 1976/3 1978/4 1981/24 1983/21 1984/8 1985/22 1985/22</p> <p>GX 701-A [1] 1957/10</p>	<p>happy [1] 2112/9</p> <p>harass [23] 1940/17 1943/5 1944/23 1945/14 1948/17 1948/22 1949/17 1949/25 1954/8 1954/9 1955/6 1958/10 1958/12 1959/3 1965/22 1986/1 1987/14 1988/18 2037/25 2038/1 2044/5 2109/2 2111/7</p> <p>harassed [3] 1938/5 1952/18 2038/20</p> <p>harassing [5] 1938/22 1952/24 1953/22 1955/16 1958/22</p> <p>harassment [25] 1943/12 1944/25 1945/12 1949/3 1949/4 1955/5 1956/24 1957/13 1958/15 1958/17 1962/25 1963/4 1963/7 1965/25 1966/11 1968/19 1976/13 2039/25 2043/8 2043/9 2043/10 2043/20 2047/12 2116/5 2118/15</p> <p>hard [2] 1995/8 2014/23</p> <p>headaches [1] 1959/21</p> <p>health [3] 1959/10 1959/11 1959/19</p> <p>heard [98] 1939/17 1940/7 1942/16 1945/10 1946/25 1951/2 1957/16 1959/9 1961/2 1961/22 1962/4 1962/25 1963/1 1963/23 1973/3 1975/22 1975/25 1976/16 1977/7 1977/21 1978/18 1983/23 1985/8 1985/10 1985/20 1985/23 1991/5 1991/23 1991/24 1991/25 1992/8 1992/14 1993/2 1993/6 1994/5 1994/7 1996/16 1996/25 1997/19 1998/16 1998/17 1999/19 2000/3 2001/11 2005/19 2008/10 2008/14 2009/25 2011/22 2014/15 2016/8 2016/22 2018/10 2019/6 2020/19 2020/21 2021/1 2021/2 2021/4 2021/16 2021/17 2021/23 2023/2 2026/4 2026/21 2027/11 2029/7 2029/24 2031/23 2040/21 2042/8 2043/2 2043/21 2043/24 2045/2 2045/24 2048/19 2051/4 2052/3 2060/25 2068/13 2068/17 2068/21 2071/19 2072/3 2075/17 2084/11 2094/1 2099/2 2105/11 2105/14 2105/20 2105/21 2108/20 2109/12 2114/4 2117/13 2118/14</p> <p>heavily [1] 2117/3</p> <p>HEEREN [9] 1933/15 1935/9 1991/5 2064/18 2107/14 2107/20 2108/8 2119/2 2123/8</p> <p>Hello [2] 2067/24 2067/24</p> <p>helpless [1] 2106/24</p> <p>hemorrhage [2] 1946/21 1959/20</p> <p>herself [2] 1963/20 2072/11</p> <p>Hi [1] 2004/20</p> <p>hidden [1] 2026/8</p> <p>hide [10] 2017/23 2019/11 2028/19 2030/1 2030/2 2031/11 2033/3 2033/4 2034/2 2034/3</p> <p>hiding [8] 2028/5 2028/25 2031/4 2031/5 2032/19 2033/9 2034/18 2035/21</p> <p>high [1] 2113/16</p> <p>highlights [2] 1974/18 2087/18</p> <p>highly [5] 1941/7 1941/15 1971/15 1985/9 2013/2</p> <p>Hill [4] 2101/9 2101/24 2102/4 2102/13</p> <p>Hills [9] 1993/21 2014/7 2014/11 2040/23 2044/2 2044/6 2044/7 2044/9</p>	<p>2117/18</p> <p>himself [17] 1944/4 1945/3 1955/13 1957/1 1958/10 1963/18 1975/24 1976/4 1993/11 2019/6 2021/4 2024/15 2058/12 2077/14 2089/13 2102/18 2116/16</p> <p>hint [1] 2087/4</p> <p>hire [5] 1940/20 1972/7 1992/6 2014/2 2116/11</p> <p>hired [20] 1941/2 1941/22 1969/9 1971/5 1974/10 1974/23 1976/8 1984/17 1988/1 1988/3 1991/22 1992/2 1992/5 1995/24 2008/12 2080/3 2080/13 2110/22 2116/21 2117/5</p> <p>history [4] 1975/9 1992/20 2060/16 2091/6</p> <p>hitting [1] 2012/8</p> <p>hold [11] 1936/20 1939/12 1966/2 1977/17 2043/18 2049/3 2065/12 2078/8 2088/18 2089/2 2098/23</p> <p>holding [1] 1960/22</p> <p>home [42] 1938/7 1938/17 1945/2 1945/22 1947/20 1947/24 1948/4 1948/12 1948/17 1949/18 1950/14 1951/1 1951/17 1955/20 1957/2 1958/12 1960/13 1961/25 1962/2 1962/24 1963/3 1969/20 1972/10 1977/1 1985/7 1985/14 1985/24 1985/24 1986/3 1986/5 1986/12 1988/6 1988/24 1993/21 1993/21 2053/2 2056/22 2058/10 2059/5 2115/19 2115/21 2116/16</p> <p>Homeland [4] 1956/17 1978/7 2074/12 2104/17</p> <p>homes [1] 2114/13</p> <p>honest [1] 1934/23</p> <p>honestly [1] 2046/2</p> <p>Hong [2] 1971/16 2039/8</p> <p>Hong Ju Jin [1] 2039/8</p> <p>Hong Kong [1] 1971/16</p> <p>Hongru [14] 1945/10 1946/1 1999/19 2005/19 2006/2 2006/16 2007/12 2007/19 2008/23 2009/1 2009/10 2009/25 2068/18 2097/9</p> <p>Hongru Jin [2] 1945/10 1999/19</p> <p>Hongzhong [2] 1993/6 1993/7</p> <p>honor [42] 1935/10 1935/13 1957/10 1983/5 1983/6 1990/7 1990/15 1990/22 2024/8 2032/3 2041/6 2046/12 2046/18 2049/2 2051/9 2054/16 2065/10 2065/21 2066/12 2068/8 2069/18 2075/12 2076/4 2076/9 2078/9 2078/20 2079/13 2080/20 2084/23 2085/1 2086/2 2090/3 2093/8 2093/15 2094/11 2096/16 2099/24 2104/3 2107/16 2108/9 2119/4 2122/2</p> <p>HONORABLE [1] 1933/9</p> <p>hope [4] 1937/1 2024/6 2066/25 2099/18</p> <p>hopefully [3] 1936/5 2011/3 2025/5</p> <p>hoping [1] 2050/14</p> <p>horribly [1] 2010/17</p> <p>hotel [6] 1945/13 1946/4 1983/25 2008/18 2009/20 2084/15</p> <p>hour [9] 1946/13 1960/12 1983/24 1999/14 1999/15 2000/1 2019/7</p>
<p>H</p> <p>H-U [1] 2003/22</p> <p>Habeeb [3] 1978/18 1979/4 2033/15</p> <p>half [4] 2019/8 2024/21 2045/14 2104/4</p> <p>halfway [2] 1938/12 1948/24</p> <p>hand [3] 2075/18 2111/17 2115/22</p> <p>handed [2] 1936/19 1980/8</p> <p>handle [3] 2003/6 2073/22 2115/20</p> <p>handled [1] 1978/11</p> <p>hands [4] 1942/13 1965/6 2055/20 2106/24</p> <p>hands-off [1] 1965/6</p> <p>hands-on [1] 1942/13</p> <p>handwriting [2] 2051/6 2051/7</p> <p>hang [2] 2104/4 2121/16</p> <p>happenstance [1] 2112/2</p>		

<p>H</p> <p>hour... [2] 2024/21 2104/5</p> <p>hours [4] 2060/8 2060/8 2060/10 2091/15</p> <p>house [18] 1950/23 1958/5 1976/22 1985/17 1985/17 2039/14 2040/16 2042/3 2045/13 2057/8 2058/18 2059/5 2101/9 2102/4 2102/6 2102/7 2111/8 2117/11</p> <p>HSI [1] 1978/18</p> <p>Hsu [3] 2080/2 2080/2 2081/2</p> <p>Hu [57] 1942/14 1942/17 1942/20 1942/25 1943/2 1943/9 1943/14 1944/14 1944/24 1944/25 1945/3 1946/12 1949/10 1955/24 1956/13 1966/12 1967/10 1967/12 1967/18 1969/16 1972/1 1972/3 1972/5 1972/18 1972/20 1972/20 1972/21 1972/23 1973/12 1974/11 1979/19 1980/5 1980/10 1980/25 1987/24 2003/21 2003/24 2009/16 2026/14 2082/2 2082/21 2082/23 2083/2 2083/4 2083/8 2084/13 2086/15 2086/21 2087/20 2087/23 2089/11 2089/16 2089/19 2098/17 2110/8 2118/13 2118/14</p> <p>Hu Ji [32] 1942/14 1942/17 1942/20 1942/25 1943/2 1943/9 1943/14 1944/14 1944/24 1944/25 1945/3 1946/12 1949/10 1972/1 1987/24 2026/14 2082/2 2082/21 2082/23 2083/2 2083/4 2083/8 2084/13 2086/15 2086/21 2087/20 2087/23 2089/11 2089/16 2089/19 2098/17 2118/13</p> <p>Hudson [2] 2022/10 2022/11</p> <p>huge [2] 2054/3 2064/2</p> <p>Hui [11] 1940/25 1966/13 1967/10 1970/5 1970/9 1971/24 1996/16 2073/4 2105/1 2118/12 2118/16</p> <p>hundreds [1] 2104/13</p> <p>hunt [8] 1973/9 1973/11 1974/3 1974/8 1985/8 1985/8 2115/24 2120/7</p> <p>hunting [1] 1971/13</p> <p>hysterically [1] 1939/1</p>	<p>imply [1] 2078/18</p> <p>important [20] 1935/4 1997/6 2004/18 2004/23 2008/6 2022/16 2025/15 2051/12 2052/11 2053/22 2053/24 2055/3 2058/13 2062/11 2062/22 2063/1 2063/25 2063/25 2071/5 2116/14</p> <p>importantly [3] 2067/4 2109/13 2111/5</p> <p>impossible [1] 2113/20</p> <p>impressed [1] 2074/7</p> <p>improperly [5] 1943/21 1956/16 1976/14 1977/22 1978/23</p> <p>inaccurate [1] 2112/3</p> <p>inadvertently [1] 2118/22</p> <p>incident [2] 2041/11 2042/15</p> <p>include [2] 2120/6 2120/14</p> <p>included [6] 1938/25 1943/18 1966/11 1976/2 2120/13 2121/8</p> <p>includes [2] 1949/19 2044/9</p> <p>including [15] 1938/4 1941/8 1952/22 1955/15 1961/24 1967/13 1967/15 1971/16 1978/3 1981/3 2013/23 2036/1 2073/24 2097/2 2104/19</p> <p>income [4] 2031/10 2032/23 2032/23 2032/24</p> <p>inconsistent [2] 1953/17 2000/12</p> <p>incorporate [1] 2121/24</p> <p>incorrect [1] 2049/12</p> <p>incredible [1] 2045/23</p> <p>incredibly [1] 1969/13</p> <p>indeed [2] 1994/20 2019/20</p> <p>indicate [2] 2001/2 2040/16</p> <p>indicates [3] 2052/25 2083/22 2088/5</p> <p>indicating [1] 2075/7</p> <p>indictment [7] 1934/22 1968/10 2037/24 2055/4 2056/17 2063/3 2063/5</p> <p>indirectly [1] 2043/15</p> <p>individual [9] 1966/18 1977/13 1977/20 1978/19 1983/9 2066/17 2071/23 2072/9 2112/20</p> <p>individuals [5] 1973/12 2075/16 2108/22 2120/21 2121/6</p> <p>inexorably [1] 2012/18</p> <p>infer [13] 1977/21 1983/15 2005/10 2012/5 2012/9 2012/13 2101/2 2101/13 2101/15 2101/15 2101/25 2111/19 2118/11</p> <p>inference [9] 2070/3 2079/16 2101/14 2114/1 2114/1 2114/2 2114/2 2116/19 2116/19</p> <p>info [3] 1976/22 1976/23 2026/7</p> <p>inform [1] 2002/10</p> <p>information [97] 1941/7 1941/12 1941/13 1941/14 1941/16 1941/21 1943/11 1943/15 1943/15 1943/16 1943/17 1943/19 1943/21 1943/24 1949/13 1949/16 1955/24 1956/4 1956/7 1956/9 1956/16 1956/18 1956/21 1967/18 1967/20 1969/14 1970/3 1970/4 1970/13 1971/15 1971/17 1971/18 1971/21 1974/23 1975/18 1976/2 1976/6 1976/9 1976/12 1976/13 1976/15 1976/25 1976/25 1977/3 1977/5 1977/10 1977/10 1977/12 1977/16 1977/17 1977/22 1978/2 1978/8 1978/9 1978/10 1978/14 1978/17 1978/19</p>	<p>1978/23 1979/4 1982/8 1982/12 1983/13 1988/14 1988/16 1999/1 1999/1 1999/6 2001/6 2021/23 2030/20 2033/12 2033/17 2033/25 2034/24 2035/22 2035/25 2036/2 2041/9 2042/18 2043/8 2052/6 2059/11 2080/8 2080/14 2080/15 2080/23 2081/5 2081/7 2081/18 2094/25 2095/1 2104/17 2117/1 2117/4 2117/7 2118/24</p> <p>informed [3] 1942/10 2014/8 2055/14</p> <p>informs [1] 1998/1</p> <p>initial [3] 1969/10 2035/24 2088/12</p> <p>initiate [1] 1967/10</p> <p>injustice [1] 2046/23</p> <p>inner [3] 2009/18 2009/19 2010/1</p> <p>innocence [3] 2012/11 2015/19 2070/6</p> <p>innocent [4] 2029/20 2036/25 2037/16 2047/15</p> <p>inquiry [2] 2002/6 2005/3</p> <p>inside [7] 1950/25 1961/25 1985/16 1985/17 1986/4 1989/2 1989/3</p> <p>insinuates [1] 2020/12</p> <p>Inspection [1] 1974/5</p> <p>instance [1] 2067/3</p> <p>instead [7] 2001/4 2029/5 2040/3 2072/7 2075/23 2077/9 2107/4</p> <p>Institute [2] 2022/10 2022/11</p> <p>instruct [15] 1953/16 1954/15 1964/12 1964/21 1965/1 1965/8 1966/17 1968/4 2000/10 2011/3 2011/23 2019/16 2037/20 2070/2 2119/11</p> <p>instructed [2] 1983/25 2006/7</p> <p>instruction [7] 1984/21 2006/6 2016/11 2038/13 2071/4 2113/12 2113/14</p> <p>instructions [16] 1934/9 1936/1 1953/18 2011/2 2042/9 2054/19 2063/4 2066/15 2066/18 2075/17 2097/21 2102/11 2119/22 2120/4 2120/8 2121/25</p> <p>instructs [1] 1953/17</p> <p>insufficiency [1] 2076/13</p> <p>integral [1] 2088/7</p> <p>intelligence [1] 2105/18</p> <p>intend [1] 1934/14</p> <p>intended [2] 1951/16 2038/22</p> <p>intent [10] 1940/14 1954/7 1954/9 1955/16 1959/3 2010/25 2027/9 2030/23 2037/25 2038/1</p> <p>intention [1] 2089/19</p> <p>intentionally [2] 1954/20 1965/12</p> <p>interacted [1] 1996/20</p> <p>interest [1] 2102/4</p> <p>interesting [3] 2052/2 2052/20 2120/18</p> <p>intermediaries [2] 1967/14 1967/25</p> <p>intermediary [1] 1972/7</p> <p>intermediate [1] 2098/6</p> <p>international [4] 1956/22 1957/12 1958/15 2100/3</p> <p>internationally [2] 1955/14 1957/6</p> <p>Interpol [11] 1975/21 1975/23 1976/1 2021/8 2090/9 2091/1 2091/3 2093/22 2093/24 2095/11 2096/9</p> <p>interpretation [1] 1937/4</p> <p>interpreter [25] 1942/8 1942/9 1979/14 2076/19 2076/19 2077/4 2078/2 2080/3 2080/24 2084/9 2086/17 2088/5 2090/13 2094/14 2094/20</p>
<p>I</p> <p>I.D [1] 1971/17</p> <p>iCloud [1] 2074/9</p> <p>idea [12] 1958/8 2039/19 2039/19 2042/13 2047/8 2060/14 2114/24 2116/11 2116/21 2117/24 2118/20 2118/21</p> <p>ideas [1] 2067/2</p> <p>identified [3] 1944/16 1988/6 2013/10</p> <p>identify [3] 2074/19 2083/3 2089/13</p> <p>identity [2] 2003/22 2089/18</p> <p>illegal [11] 1946/16 1953/5 1964/8 1964/10 1964/22 1979/1 1981/21 1981/22 1987/13 2076/3 2109/7</p> <p>illegally [2] 2012/23 2014/21</p> <p>images [2] 1938/25 1985/21</p> <p>imagine [1] 2051/3</p> <p>immediate [2] 1954/13 2112/11</p> <p>immediately [5] 1941/20 1975/11 1975/18 2051/7 2055/5</p> <p>immigration [3] 1992/13 2074/12 2104/17</p>		

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interpreter... [10] 2095/2 2095/6 2095/15 2095/18 2095/21 2095/22 2096/1 2096/3 2096/24 2103/2 interrogated [1] 2019/7 interrupt [1] 2007/18 intersection [1] 1996/14 interstate [32] 1953/9 1953/19 1954/2 1954/5 1954/15 1954/18 1955/4 1955/4 1955/9 1959/2 1960/11 1960/14 1961/18 1962/15 1962/17 1963/7 1964/6 1965/17 2024/20 2037/19 2037/21 2037/23 2037/25 2038/9 2038/17 2052/16 2056/8 2056/9 2058/14 2067/12 2068/23 2070/10 interview [6] 1956/12 1957/5 1960/20 1974/6 1983/3 2046/7 interviewed [2] 2084/18 2118/1 intimidate [12] 1940/18 1950/15 1954/8 1954/9 1955/6 1959/3 1965/23 1985/14 1986/1 1987/14 2038/1 2109/2 intimidated [1] 2038/21 intimidating [1] 1953/22 intimidation [7] 1943/13 1949/6 1952/21 1955/5 1956/24 1957/12 1968/19 introduce [4] 2077/15 2077/17 2088/12 2088/14 introduced [7] 2000/14 2000/15 2000/17 2031/13 2082/1 2088/9 2088/24 introducing [1] 2102/18 invaded [3] 1960/16 1985/15 1989/1 invasive [2] 1943/12 1962/18 investigate [2] 1977/19 2036/1 investigating [3] 1995/19 2010/13 2109/4 investigation [11] 1992/3 2000/24 2004/16 2004/16 2017/20 2018/21 2020/9 2026/22 2026/23 2039/17 2046/6 investigations [1] 2023/4 investigative [2] 1979/15 2016/4 investigator [41] 1940/21 1949/1 1957/15 1970/1 1970/3 1970/12 1975/8 1975/10 1975/19 1977/7 1988/1 1988/3 1991/23 1992/3 1992/9 1992/16 1992/18 1992/22 2001/23 2003/13 2007/16 2007/21 2008/25 2009/4 2009/7 2029/2 2035/22 2046/3 2047/11 2072/15 2073/23 2080/13 2080/25 2087/21 2088/4 2088/10 2090/11 2093/19 2093/20 2094/14 2104/19 investigators [8] 1991/25 1992/2 1994/2 1994/18 2014/13 2018/22 2022/13 2032/2 investment [1] 2026/9 invitation [1] 2024/10 invited [2] 2005/23 2009/22 invoice [1] 2001/24 invoices [2] 2016/14 2016/19 involved [24] 1945/17 1953/2 1965/25 1966/10 1974/2 1992/3 1995/24 1997/12 2001/7 2013/13 2013/17 2016/10 2022/18 2022/19 2044/23	J J Lifetime [3] 2002/3 2002/5 2041/1 J-I [1] 2003/22 jail [5] 1947/18 1960/6 2025/12 2027/4 2100/22 jailed [1] 1947/13 Jane [1] 2120/3 Jason [10] 1969/12 1971/10 1975/2 1975/13 1979/11 1993/5 2001/4 2043/15 2110/7 2118/22 Jason Zhu [2] 1993/5 2043/15 jerk [1] 2063/23 Jersey [42] 1938/8 1938/13 1942/17 1943/3 1945/1 1945/8 1946/13 1950/17 1955/12 1956/25 1957/22 1959/16 1960/13 1962/21 1968/19 1976/15 1976/16 1978/3 1991/25 1992/9 1992/15 1992/18 1992/23 1993/21 1993/22 1994/13 2013/4 2014/12 2028/4 2034/9 2034/21 2035/23 2036/17 2038/10 2050/4 2053/2 2053/13 2053/21 2055/19 2055/24 2060/12 2082/4 Ji [55] 1942/14 1942/17 1942/20 1942/25 1943/2 1943/9 1943/14 1944/14 1944/24 1944/25 1945/3 1946/12 1949/10 1955/24 1956/13 1966/12 1967/10 1967/13 1967/18 1969/17 1972/1 1972/3 1972/5 1972/20 1972/21 1972/23 1973/12 1974/11 1979/19 1980/5 1980/11 1980/25 1987/24 2003/22 2003/24 2009/16 2026/14 2082/2 2082/21 2082/23 2083/2 2083/4 2083/8 2084/13 2086/15 2086/21 2087/20 2087/23 2089/11 2089/16 2089/19 2098/17 2110/8 2118/13 2118/14 Jin [143] 1937/24 1938/2 1938/5 1938/9 1938/14 1938/17 1938/19 1938/23 1939/6 1940/22 1941/2 1941/22 1941/23 1942/1 1942/3 1943/5 1944/2 1945/3 1945/7 1945/10 1945/14 1945/24 1945/25 1946/1 1946/2 1946/24 1946/24 1947/15 1947/25 1948/1 1948/4 1948/4 1948/8 1948/14 1948/22 1948/25 1949/8 1949/15 1949/17 1949/25 1950/13 1951/14 1951/16 1952/2 1952/8	

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<p>L</p> <p>liable [3] 2088/21 2089/2 2098/23</p> <p>liar [2] 2053/18 2053/18</p> <p>license [4] 1949/19 1976/18 1978/4 1995/6</p> <p>licensed [2] 1992/9 2073/23</p> <p>lie [16] 1971/10 1971/11 1975/9 1975/10 2050/4 2050/18 2050/18 2050/20 2050/20 2050/21 2051/22 2103/8 2103/8 2103/9 2103/15 2111/24</p> <p>lied [24] 1958/20 1975/14 2010/12 2010/13 2010/13 2011/10 2024/15 2046/10 2050/8 2050/10 2050/10 2050/13 2050/16 2050/23 2051/15 2051/21 2064/18 2064/24 2064/25 2111/21 2111/22 2114/17 2114/17 2114/17</p> <p>lies [3] 2064/17 2064/25 2111/21</p> <p>life [7] 1962/12 1963/20 1991/14 1993/23 2037/1 2037/3 2064/3</p> <p>Lifetime [3] 2002/3 2002/5 2041/1</p> <p>light [1] 2071/14</p> <p>lightweight [1] 2003/5</p> <p>likely [4] 2057/2 2081/2 2114/1 2114/2</p> <p>likewise [2] 2042/17 2045/6</p> <p>limited [1] 1977/9</p> <p>Lina [1] 2080/3</p> <p>Lina Xu [1] 2080/3</p> <p>line [10] 1969/11 1975/21 1976/4 1991/14 2019/3 2062/22 2100/4 2108/23 2108/23 2108/25</p> <p>lines [3] 1957/12 2011/18 2050/2</p> <p>Linguist [1] 2086/16</p> <p>link [3] 1976/4 2027/25 2043/13</p> <p>linked [1] 2042/11</p> <p>links [2] 2043/17 2043/25</p> <p>Liping [1] 1992/8</p> <p>Liping Shi [1] 1992/8</p> <p>list [6] 2002/3 2045/7 2082/20 2100/3 2119/23 2120/10</p> <p>listed [2] 1971/2 2083/15</p> <p>listen [13] 1997/6 2062/10 2062/23 2063/1 2063/11 2066/1 2066/22 2110/10 2110/11 2110/16 2110/20 2111/9 2113/11</p> <p>listened [2] 2005/20 2006/3</p> <p>listening [4] 2047/16 2064/9 2067/17 2107/11</p> <p>lists [2] 1934/8 2119/24</p> <p>literal [1] 2006/21</p> <p>literally [1] 1947/22</p> <p>litigation [1] 2111/11</p> <p>Little Ferry [1] 2039/16</p> <p>Liu [55] 1937/25 1938/2 1938/6 1938/7 1938/17 1938/23 1938/24 1939/2 1939/6 1943/5 1943/15 1944/4 1945/2 1947/1 1947/9 1947/22 1951/14 1951/16 1952/3 1952/5 1952/5 1952/7 1952/8 1952/18 1952/20 1952/24 1953/23 1954/9 1954/12 1957/2 1957/7 1960/16 1961/22 1961/23 1963/1 1963/2 1963/9 1963/20 1963/23 1965/23 1969/20 1972/9 1977/23 1985/14 1985/24 1986/11 1987/14 1987/25 1988/19 1988/24 2038/2 2041/3 2045/6 2083/20 2117/11</p>	<p>Liu Fang [11] 1937/25 1938/2 1938/6 1938/17 1939/2 1939/6 1943/5 1947/1 1987/14 1987/25 1988/19</p> <p>Liu Fang's [7] 1938/7 1938/23 1938/24 1943/15 1945/2 1947/9 1988/24</p> <p>Liu Yan [4] 1947/22 2041/3 2045/6 2083/20</p> <p>Liu's [2] 1995/4 2101/9</p> <p>LLC [1] 2041/1</p> <p>lo [8] 2055/12 2055/12 2055/15 2055/15 2055/16 2099/5 2099/5 2099/10</p> <p>local [5] 2014/8 2015/8 2015/11 2015/17 2017/18</p> <p>locate [22] 1940/21 1941/2 1944/23 1946/2 1948/8 1973/11 1977/19 1988/1 2020/11 2071/22 2072/9 2072/12 2072/13 2075/2 2075/6 2075/8 2075/10 2075/21 2080/13 2089/20 2090/23 2110/9</p> <p>located [4] 1949/15 1972/8 1988/6 2076/21</p> <p>locating [2] 1977/13 2073/23</p> <p>locked [2] 1950/22 1962/3</p> <p>logic [1] 2031/3</p> <p>LOL [1] 1957/24</p> <p>long-lasting [1] 1952/19</p> <p>looked [6] 1975/14 1976/9 2004/23 2015/21 2113/24 2121/2</p> <p>looks [4] 1940/23 2030/16 2063/20 2108/24</p> <p>loop [1] 2102/3</p> <p>lose [2] 2058/17 2064/1</p> <p>lost [1] 2060/13</p> <p>loud [3] 1957/24 2063/22 2108/10</p> <p>lowly [1] 2097/24</p> <p>luck [1] 2067/17</p> <p>Lui [2] 1976/3 1976/10</p> <p>lunch [5] 1990/18 1990/19 2023/12 2024/6 2091/15</p> <p>Luncheon [1] 2023/25</p> <p>LUSTBERG [3] 1933/18 2023/6 2023/20</p> <p>Lusterberg [14] 1935/5 1989/25 1990/6 1990/14 1990/16 1990/18 1990/21 1994/9 2024/7 2046/14 2047/3 2047/17 2107/3 2123/5</p> <p>lying [2] 2056/11 2056/15</p> <p>M</p> <p>Macao [1] 1971/16</p> <p>mafia [1] 2099/6</p> <p>mail [31] 1938/24 1938/24 1942/9 1971/8 1971/24 1974/25 1975/12 1975/13 1975/15 1975/20 1979/3 1995/12 1997/23 2000/2 2000/20 2073/2 2073/2 2073/5 2073/9 2073/9 2073/13 2073/13 2074/11 2075/6 2077/6 2100/12 2116/24 2118/9 2118/19 2121/23 2121/24</p> <p>mailed [1] 1949/11</p> <p>mailing [3] 2117/17 2117/17 2117/17</p> <p>mailings [6] 1952/6 1952/9 1952/12 1952/13 1963/2 2114/12</p> <p>mails [3] 2000/17 2074/24 2116/25</p> <p>mainland [2] 1951/2 1986/13</p> <p>major [3] 1976/11 1976/11 2100/18</p> <p>male [1] 2073/24</p>	<p>man [10] 1943/25 1944/2 1945/21 1948/23 1972/18 1996/11 2047/15 2048/21 2061/4 2117/5</p> <p>manager [2] 2004/20 2005/11</p> <p>managing [1] 2041/3</p> <p>manipulated [1] 2046/10</p> <p>manipulative [1] 2010/17</p> <p>manipulativeness [1] 2045/23</p> <p>mapped [2] 2052/9 2052/21</p> <p>March [1] 1944/24</p> <p>March 2017 [1] 1944/24</p> <p>marching [1] 1985/6</p> <p>marijuana [3] 2053/6 2053/10 2055/22</p> <p>mark [1] 2030/23</p> <p>Martha [1] 2027/15</p> <p>Martha Burn [1] 2027/15</p> <p>Mary [1] 2027/15</p> <p>Mary McMahon [1] 2027/15</p> <p>massacre [1] 2088/18</p> <p>match [1] 2074/11</p> <p>matter [15] 1951/4 1964/3 1981/18 2006/5 2017/17 2031/3 2031/4 2033/20 2034/15 2045/21 2063/24 2073/23 2112/7 2112/9 2122/7</p> <p>matters [4] 2023/4 2039/18 2066/8 2112/12</p> <p>Matthew [1] 1966/21</p> <p>May 13 [1] 2101/18</p> <p>May 2018 [1] 1972/8</p> <p>MC [3] 1976/21 2001/20 2003/3</p> <p>McCarthy [1] 2025/11</p> <p>McGuire's [1] 1966/21</p> <p>MCMAHON [291]</p> <p>McMahon's [25] 1941/3 1955/18 1958/9 1962/22 1969/15 1974/20 1975/8 1978/21 1979/7 1982/1 1982/14 1983/11 1984/17 1991/14 1994/4 2017/17 2024/24 2027/9 2029/23 2030/14 2030/17 2030/19 2034/7 2042/20 2110/20</p> <p>mean [27] 1935/2 1935/16 1940/10 1946/8 1983/20 2006/20 2008/21 2009/17 2028/20 2032/13 2043/20 2048/17 2058/1 2062/10 2062/19 2064/14 2073/18 2075/1 2076/17 2077/19 2084/8 2087/24 2098/4 2101/12 2101/23 2103/15 2104/12</p> <p>meaning [11] 1947/2 1969/12 1971/6 1975/5 1976/21 1977/16 1978/12 2001/22 2006/21 2048/8 2065/14</p> <p>means [6] 1951/2 1966/17 1968/15 1984/24 2075/10 2098/22</p> <p>meant [8] 1944/9 1944/10 1944/10 1957/11 1957/11 1984/8 2016/17 2099/6</p> <p>meanwhile [1] 2008/13</p> <p>mechanical [1] 1933/25</p> <p>media [4] 1985/9 1985/9 2115/24 2115/25</p> <p>meet [5] 1942/15 1947/7 1956/14 2071/11 2084/13</p> <p>meeting [35] 1942/16 1942/19 1942/22 1943/3 1945/16 1946/3 1946/14 1948/3 1948/4 1956/15 1969/16 1972/2 1972/3 1972/5 1978/6 1983/16 1983/17 1983/22 1983/24 1983/25 1996/5 1996/12 1996/25 1999/12 1999/12 1999/16 1999/18 1999/23</p>
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[7] 2005/21 2005/22 2006/25 2009/1 2010/1 2026/16 2087/19</p> <p>meetings [1] 1998/14</p> <p>MELINDA [1] 1933/20</p> <p>member [6] 1954/13 1954/22 1965/13 2041/3 2070/14 2118/17</p> <p>members [5] 1944/5 1959/21 1988/15 1993/11 2118/13</p> <p>memo [1] 1969/11</p> <p>memory [1] 2072/19</p> <p>men [3] 1961/24 2042/2 2082/22</p> <p>menace [1] 2061/1</p> <p>mental [3] 1962/5 1962/10 1963/10</p> <p>mention [4] 2025/12 2035/21 2044/14 2101/6</p> <p>mentioned [9] 1937/1 1972/25 1984/10 2006/4 2024/25 2052/17 2052/19 2072/4 2115/9</p> <p>mentioning [2] 2077/22 2079/8</p> <p>mentions [3] 2020/14 2020/17 2020/18</p> <p>MEREDITH [1] 1933/16</p> <p>merit [1] 2113/3</p> <p>meshes [1] 1948/16</p> <p>message [16] 1944/2 1950/18 1964/2 1984/4 1985/18 1985/19 1997/25 2015/6 2075/6 2114/4 2114/7 2114/8 2115/6 2115/8 2115/15 2116/3</p> <p>messages [13] 1938/9 1938/9 1938/22 1950/2 1950/5 1950/7 1950/8 2074/23 2075/6 2093/23 2096/3 2097/14 2112/11</p> <p>messaging [1] 2083/6</p> <p>met [20] 1943/10 1945/9 1946/11 1946/12 1946/13 1980/5 1987/23 1996/2 1996/20 2013/2 2038/6 2039/3 2072/4 2082/4 2082/9 2082/22 2083/2 2083/9 2084/1 2095/20</p> <p>methods [2] 1949/5 1982/6</p> <p>mic [1] 2107/20</p> <p>MICHAEL [30] 1933/6 1939/8 1940/20 1941/17 1948/2 1948/21 1966/24 1971/4 1972/3 1972/7 1974/13 1974/14 1975/15 1988/3 1988/11 1988/21 2003/22 2018/8 2019/24 2019/25 2028/21 2042/12 2042/12 2046/3 2084/6 2087/21 2104/20 2110/20 2116/11 2117/2</p> <p>Michael McMahon [3] 2028/21 2084/6 2087/21</p> <p>microscopic [1] 2037/4</p> <p>middle [3] 1942/24 2077/16 2111/11</p> <p>middleman [19] 1970/11 1970/14 1971/2 1971/3 2077/3 2077/8 2077/14 2077/14 2077/14 2077/16 2077/18 2081/10 2081/11 2081/14 2081/16 2081/24 2087/19 2102/18 2117/19</p> <p>might [7] 1951/9 1951/10 1959/13 2080/16 2111/5 2119/4 2119/5</p> <p>Mike [85] 1991/14 1991/20 1992/17 1992/19 1994/17 1995/24 1996/6 1996/12 1996/13 1996/19 1997/4 1997/18 1997/23 1998/3 1998/5 1998/7 1998/12 2000/18 2001/2 2001/13 2003/14 2003/15 2003/23 2004/2 2004/3 2004/9 2004/12 2004/20 2004/20 2005/15 2005/22 2006/4 2006/4 2006/5 2006/6 2006/9</p>	<p>2007/4 2008/12 2008/12 2008/23 2009/14 2009/18 2010/8 2010/12 2010/21 2011/9 2011/15 2011/16 2012/18 2012/23 2013/14 2013/21 2014/6 2014/19 2015/6 2015/12 2015/13 2015/24 2016/4 2016/11 2016/23 2017/8 2017/16 2017/17 2018/10 2018/21 2019/5 2019/17 2020/6 2020/10 2020/16 2026/15 2036/11 2036/14 2036/24 2037/16 2043/14 2046/5 2046/9 2046/25 2047/8 2080/4 2081/17 2089/24 2090/11</p> <p>Mike McMahon [9] 1992/17 1998/3 1998/5 2036/24 2043/14 2080/4 2081/17 2089/24 2090/11</p> <p>Mike's [6] 1997/8 2000/21 2003/11 2015/2 2015/4 2015/18</p> <p>Mikey's [1] 2029/23</p> <p>Millburn [1] 2014/11</p> <p>millions [2] 2102/21 2102/21</p> <p>mind [10] 1934/25 1989/19 2023/19 2053/17 2056/18 2062/6 2081/10 2091/21 2114/10 2119/9</p> <p>minds [1] 2060/2</p> <p>Minjun [2] 1946/22 1996/16</p> <p>minute [3] 1995/13 2103/10 2104/2</p> <p>minutes [17] 1972/22 1978/1 1989/25 1998/14 2015/22 2023/7 2025/4 2037/18 2041/13 2082/24 2086/12 2091/17 2091/22 2092/3 2116/9 2118/5 2119/2</p> <p>Miranda [1] 2084/22</p> <p>misconduct [1] 2010/20</p> <p>misguided [2] 2096/12 2106/25</p> <p>misread [1] 2006/14</p> <p>missed [1] 1985/19</p> <p>missing [3] 2027/24 2031/18 2103/12</p> <p>mission [5] 1959/15 2025/23 2027/2 2027/2 2069/4</p> <p>missions [1] 2105/19</p> <p>misspoke [1] 1980/10</p> <p>misstated [1] 2049/13</p> <p>mistake [2] 1960/18 2013/1</p> <p>Mister [1] 1975/2</p> <p>misunderstanding [3] 1995/10 1995/14 2004/25</p> <p>misused [1] 1976/14</p> <p>moment [9] 1940/5 1953/12 1983/14 1998/9 1998/13 2008/8 2011/22 2107/18 2108/3</p> <p>moments [2] 1971/24 2117/13</p> <p>Monday [4] 2001/22 2001/25 2003/13 2010/16</p> <p>money [61] 1971/7 1971/10 1971/12 1975/13 1980/7 1982/11 1982/17 1982/19 1982/20 1994/21 1995/15 1995/20 1995/21 1997/20 2000/20 2001/3 2001/4 2004/21 2005/1 2005/12 2016/16 2017/21 2017/25 2018/10 2020/10 2025/11 2025/24 2027/18 2028/11 2028/19 2028/19 2028/22 2028/23 2029/3 2029/10 2029/22 2030/1 2030/2 2030/5 2030/6 2030/9 2030/10 2031/4 2031/16 2031/17 2031/19 2032/10 2032/12 2032/25 2036/25 2055/20 2060/22 2072/9 2084/8 2084/8 2084/8 2096/10</p>	<p>2103/3 2103/9 2103/15 2103/16 monitor [2] 1976/23 2001/21 monitored [1] 2083/16 monitoring [1] 2083/13 monopoly [1] 2070/18 month [4] 1949/24 2050/10 2050/10 2053/10 months [4] 1979/17 1988/4 1993/16 2047/12</p> <p>Moreover [1] 2041/11</p> <p>morning [21] 1934/2 1937/22 1937/23 1939/19 1955/20 1989/17 1990/23 1990/24 2003/4 2003/4 2004/21 2011/22 2025/18 2025/19 2027/5 2031/15 2038/11 2039/13 2073/3 2102/25 2103/6</p> <p>most [21] 1944/16 1976/5 1982/17 1991/2 1996/18 2014/3 2038/25 2053/24 2057/2 2067/4 2077/8 2077/10 2081/2 2081/10 2090/9 2090/16 2095/11 2109/6 2109/13 2114/1 2114/2</p> <p>mother [5] 1938/25 1952/15 2088/19 2089/3 2089/5</p> <p>motion [1] 1956/2</p> <p>motor [5] 1976/15 1977/13 1991/25 2034/10 2036/17</p> <p>Motor Vehicle Commission [2] 2034/10 2036/17</p> <p>mouth [1] 2066/1</p> <p>move [1] 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1999/25 2000/22 2000/23 2001/8 2001/20 2002/5 2005/7 2005/8 2008/15 2009/11 2016/2 2019/21 2022/18 2024/12 2024/13 2025/9</p>
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<p>O</p> <p>objection... [13] 2068/8 2075/12 2076/4 2079/13 2084/20 2084/20 2084/23 2084/24 2086/3 2086/4 2096/16 2120/22 2121/1</p> <p>objective [2] 2110/18 2112/13</p> <p>obligation [1] 2018/7</p> <p>observe [2] 1961/3 1961/6</p> <p>obtain [5] 1943/14 1967/11 1988/13 1988/16 2013/22</p> <p>obtained [10] 1950/14 1956/16 1969/18 1976/15 1977/4 1977/10 1977/22 1978/23 1988/13 1994/19</p> <p>obtaining [3] 2026/18 2033/12 2033/17</p> <p>obvious [6] 1943/4 1959/2 1985/2 1987/6 2108/24 2116/4</p> <p>obviously [15] 1943/12 1946/16 1971/11 1971/21 1989/25 2010/7 2023/14 2039/16 2047/20 2049/7 2068/15 2091/14 2095/22 2101/1 2108/4</p> <p>occasions [1] 2013/4</p> <p>occurred [6] 1945/17 1968/19 1968/20 1998/18 1999/22 2025/20</p> <p>occurring [1] 2087/24</p> <p>occurs [2] 2041/11 2043/23</p> <p>October [38] 1941/17 1942/2 1942/11 1942/13 1942/18 1955/21 1956/3 1956/8 1956/13 1967/12 1972/2 1975/1 1977/25 1979/9 1979/16 1993/16 1993/17 2019/5 2022/8 2081/20 2081/20 2082/21 2082/23 2083/1 2083/4 2084/1 2084/3 2084/3 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2074/3 2075/1 2082/3 2089/13 2120/15</p>	<p>officials [27] 1942/11 1944/22 1945/11 1947/23 1955/23 1956/18 1957/18 1962/19 1965/24 1966/10 1966/23 1971/23 1972/16 1981/4 1995/24 2008/7 2009/17 2013/2 2074/17 2074/18 2104/16 2104/22 2105/1 2105/2 2110/17 2118/8 2118/23</p> <p>offshore [5] 1995/11 1995/14 2004/15 2026/18 2026/21</p> <p>often [1] 1935/17</p> <p>old [4] 1946/20 2040/3 2069/10 2069/12</p> <p>older [1] 1963/12</p> <p>one's [1] 2016/21</p> <p>ongoing [1] 1943/5</p> <p>open [11] 1934/1 1934/25 1938/18 1950/21 1985/16 1989/19 2023/19 2024/2 2053/17 2091/21 2119/9</p> <p>opened [1] 2044/11</p> <p>opening [5] 1937/10 1955/13 2012/2 2040/6 2088/11</p> <p>openings [1] 1997/22</p> <p>operate [2] 1966/19 2023/4</p> <p>operation [22] 1973/9 1973/10 1974/3 1974/8 1985/7 1985/8 1995/25 1997/1 2008/8 2009/19 2020/14 2020/17 2020/17 2020/18 2021/12 2021/15 2021/16 2021/17 2021/20 2088/8 2111/4 2115/23</p> <p>opportunity [3] 1966/6 1967/4 2039/2</p> <p>opposed [5] 2012/25 2029/12 2032/23 2034/19 2076/7</p> <p>opposite [1] 2016/20</p> <p>options [2] 1938/10 1944/3</p> <p>order [19] 1934/14 1934/22 1934/22 1935/1 1938/8 1940/18 1943/5 1945/3 1946/2 1956/14 1987/14 2029/21 2031/25 2035/9 2036/6 2037/21 2040/20 2047/13 2090/22</p> <p>ordered [1] 2006/23</p> <p>orders [2] 1957/18 1985/6</p> <p>ordinary [1] 2106/1</p> <p>organization [1] 2073/12</p> <p>origin [2] 2070/23 2070/24</p> <p>Otherwise [2] 2081/13 2121/25</p> <p>outline [1] 2038/5</p> <p>outlined [1] 1974/7</p> <p>outset [5] 1979/9 1994/20 2011/10 2075/1 2084/4</p> <p>outside [6] 1948/17 1949/1 1956/25 1958/12 2012/6 2111/8</p> <p>overall [3] 1948/13 2110/3 2110/18</p> <p>overarching [2] 1953/1 1965/22</p> <p>overnight [1] 1963/21</p> <p>overrule [1] 2065/16</p> <p>Overruled [13] 1966/3 1967/4 2032/4 2041/7 2046/19 2049/4 2051/10 2065/11 2068/9 2068/9 2068/9 2079/14 2096/17</p> <p>overseas [8] 1972/25 1972/25 1973/2 1973/6 1973/7 1973/18 1974/3 2110/13</p> <p>oversight [1] 1982/19</p> <p>overt [9] 1958/1 1958/4 1965/14 2039/13 2119/23 2120/9 2120/16 2120/17 2120/24</p> <p>overwhelming [1] 1974/16</p> <p>owe [3] 1971/12 2103/9 2103/15</p>	<p>owed [8] 1971/7 1971/9 1971/10 1975/13 2001/3 2071/23 2072/9 2103/3</p> <p>owes [1] 2103/16</p> <p>own [20] 1938/15 1944/8 1944/11 1947/1 1972/17 1975/15 1983/2 1984/18 1993/21 2008/11 2008/13 2020/20 2028/2 2028/23 2029/1 2035/14 2059/9 2062/4 2110/6 2117/25</p> <p>owned [9] 1977/1 1977/1 2001/3 2001/4 2035/9 2036/7 2036/12 2040/24 2040/25</p> <p>P</p> <p>package [3] 1984/5 2000/2 2000/4</p> <p>packages [1] 2114/6</p> <p>Page 3 [1] 1995/7</p> <p>pages [11] 1944/11 1944/19 1947/9 1950/10 1963/22 2005/24 2015/3 2021/6 2025/7 2083/17 2103/21</p> <p>paid [33] 1939/22 1941/4 1946/17 1967/23 1969/12 1993/2 2027/19 2027/20 2027/21 2027/23 2028/2 2028/3 2028/14 2028/15 2030/17 2030/17 2031/23 2032/1 2032/5 2032/8 2032/22 2053/9 2064/5 2081/25 2081/25 2084/8 2084/8 2084/9 2098/9 2102/18 2102/21 2109/11 2115/24</p> <p>pain [1] 1963/10</p> <p>pains [1] 2104/14</p> <p>painstaking [1] 2104/14</p> <p>PAMELA [1] 1933/9</p> <p>Panera [24] 1942/16 1942/20 1942/22 1943/10 1946/13 1969/16 1972/2 1980/5 1980/6 1980/9 1983/22 1996/4 1996/4 1996/6 1996/11 1999/12 1999/14 2009/2 2013/3 2013/7 2028/3 2037/8 2082/4 2082/22</p> <p>Panera Bread [4] 2028/3 2037/8 2082/4 2082/22</p> <p>paragraph [1] 2034/25</p> <p>Paramus [2] 2013/4 2028/4</p> <p>parents [2] 1950/2 1956/8</p> <p>park [2] 1948/17 1958/12</p> <p>part [27] 1957/4 1962/16 1964/19 1968/18 1972/23 1972/24 1973/1 1976/13 1985/25 2005/3 2009/18 2009/21 2010/1 2016/9 2018/15 2018/19 2037/15 2052/4 2052/20 2055/16 2057/11 2062/25 2081/4 2088/7 2113/9 2116/15 2117/10</p> <p>participant [2] 1977/16 2035/1</p> <p>participants [1] 1945/17</p> <p>participate [2] 2108/22 2116/20</p> <p>participated [6] 1939/9 1952/25 1963/7 2110/4 2112/6 2118/15</p> <p>particular [6] 1940/3 1949/3 2027/14 2034/25 2035/7 2085/15</p> <p>particularly [2] 1984/22 1994/19</p> <p>parties [6] 1937/2 1968/14 1968/15 2049/7 2105/10 2121/4</p> <p>party [12] 1937/16 1962/9 1973/4 2027/1 2070/15 2070/18 2070/18 2070/21 2077/17 2077/17 2081/12 2081/13</p> <p>party-state [1] 1973/4</p>
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1956/8 1956/14 1964/20 1967/16 1968/18 1970/4 1972/21 1984/3 1987/22 1995/17 2048/6 2048/8 2068/5 2071/10 2071/21 2071/23 2073/10 2074/25 2075/3 2083/21 2083/21 2089/11 2089/12 2089/20 2100/20 2105/17 2105/20 2105/23</p> <p>stay [1] 2002/12</p> <p>stayed [1] 1962/2</p> <p>staying [1] 2009/7</p> <p>stenography [1] 1933/25</p> <p>step [2] 1954/23 2005/14</p> <p>steps [4] 1957/1 1957/3 2026/2 2113/18</p> <p>stick [2] 2076/6 2077/12</p> <p>stipulated [1] 1968/14</p> <p>stipulation [1] 2014/25</p> <p>stock [1] 2026/9</p> <p>stolen [2] 2000/20 2020/9</p> <p>stood [2] 1987/18 1991/18</p> <p>stop [4] 2107/15 2108/6 2114/16 2119/6</p> <p>store [1] 2053/10</p> <p>stored [1] 1978/11</p> <p>story [5] 1992/6 2010/4 2010/7 2010/8 2071/19</p> <p>straightforward [2] 1953/20 2103/24</p> <p>stranger [1] 1938/22</p> <p>Strangers [2] 1938/7 1938/17</p> <p>stressed [1] 1950/8</p> <p>stretch [1] 2030/22</p> <p>stretching [1] 2036/23</p> <p>strictly [2] 1977/18 2035/1</p> <p>strongly [1] 2039/24</p> <p>structure [4] 1973/5 1974/7 2070/16 2070/17</p> <p>structures [1] 2105/7</p> <p>student [6] 1980/16 1980/19 1981/9 1981/18 2029/24 2042/24</p> <p>studying [1] 2020/23</p>
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2063/12 2118/6</p> <p>suggests [1] 1956/10</p> <p>Suites [4] 1996/24 1999/24 2005/22 2009/20</p> <p>summarize [4] 1939/19 1969/7 1974/17 1983/14</p> <p>summarized [1] 2040/22</p> <p>summarizing [1] 2012/16</p> <p>summary [3] 1974/24 2082/17 2107/8</p> <p>summation [8] 1935/12 1937/6 1937/11 2014/5 2024/7 2024/23 2027/12 2067/23</p> <p>summations [3] 1934/8 1937/3 1937/7</p> <p>summed [2] 2007/2 2008/21</p> <p>summer [1] 1950/4</p> <p>Sun [11] 1940/25 1966/12 1967/9 1970/4 1970/8 1971/24 1996/16 2073/4 2105/1 2118/12 2118/16</p> <p>Sun Hui [1] 1996/16</p> <p>support [1] 1984/18</p> <p>supported [2] 2043/17 2109/19</p> <p>supports [1] 2094/6</p> <p>suppose [2] 2065/3 2112/21</p> <p>supposed [9] 1952/16 1975/5 2020/18 2055/15 2056/20 2090/4 2090/13 2090/23 2100/10</p> <p>supposedly [5] 1952/7 1976/8 2054/14 2055/18 2060/7</p> <p>surgery [1] 1959/19</p> <p>surrounding [2] 2106/10 2115/18</p> <p>surveil [2] 1945/14 1988/1</p> <p>surveillance [61] 1942/3 1943/23 1946/2 1954/8 1956/3 1957/2 1957/20 1958/1 1958/4 1962/18 1962/22</p>	<p>1967/11 1967/15 1968/18 1969/19 1972/9 1972/11 1972/12 1976/9 1976/17 1977/12 1977/19 1983/23 1988/5 1988/7 1993/15 1994/1 1994/15 1994/18 1997/1 2003/5 2007/13 2007/19 2007/20 2007/23 2007/24 2008/11 2008/12 2008/13 2008/14 2013/3 2013/21 2014/7 2014/20 2019/10 2035/2 2038/1 2039/5 2039/8 2039/9 2039/13 2040/4 2040/7 2040/11 2040/14 2040/15 2040/17 2041/10 2044/23 2047/10 2101/12</p> <p>surveilled [3] 1939/10 1942/6 1988/11</p> <p>surveillance [1] 1957/19</p> <p>survive [1] 1945/21</p> <p>suspects [1] 2019/7</p> <p>sustain [1] 2084/24</p> <p>Sustained [10] 2046/13 2047/3 2047/3 2054/17 2054/17 2066/13 2075/13 2076/5 2077/11 2084/24</p> <p>swayed [1] 2037/2</p> <p>switch [1] 2003/5</p> <p>switched [1] 1981/16</p> <p>sympathetic [1] 2106/18</p> <p>sympathy [1] 2106/20</p> <p>system [8] 1973/4 2000/9 2000/13 2048/7 2048/15 2051/23 2064/14 2070/5</p> <p>systems [2] 2048/11 2105/9</p> <p>T</p> <p>table [6] 1960/22 1963/6 2009/8 2051/25 2064/20 2083/4</p> <p>tacit [1] 1934/17</p> <p>tactic [1] 1957/13</p> <p>talks [2] 2060/10 2115/14</p> <p>tape [5] 2005/21 2008/8 2057/4 2057/4 2067/15</p> <p>tape-recording [1] 2005/21</p> <p>taped [2] 1950/22 1960/23</p> <p>target [10] 2052/14 2080/8 2093/22 2094/8 2095/11 2096/9 2103/3 2103/9 2103/15 2103/16</p> <p>targeted [1] 1949/25</p> <p>Tarkin [1] 2040/22</p> <p>task [5] 1946/23 1946/24 1947/1 1947/4 1947/6</p> <p>tasked [3] 1945/7 1983/18 1987/24</p> <p>tax [8] 1982/12 1982/15 2018/25 2031/10 2031/20 2031/20 2032/16 2032/17</p> <p>taxes [7] 1997/20 2016/17 2017/24 2031/9 2031/18 2031/21 2032/21</p> <p>teach [1] 1936/19</p> <p>team [1] 1946/10</p> <p>technical [2] 2038/19 2074/7</p> <p>technically [1] 2058/24</p> <p>technique [2] 1936/20 1949/3</p> <p>technologies [1] 2074/10</p> <p>technology [2] 2069/11 2074/19</p> <p>telephone [1] 2087/16</p> <p>telephones [1] 2052/6</p> <p>teller [1] 2055/11</p> <p>ten [1] 2086/12</p> <p>terminate [1] 2113/18</p> <p>terminated [3] 2083/10 2084/10 2116/12</p>	<p>terms [15] 1936/9 2000/19 2001/13 2018/5 2024/16 2034/6 2036/16 2048/23 2049/6 2051/6 2053/18 2056/7 2064/14 2065/24 2066/2</p> <p>terrible [3] 1958/8 2012/25 2061/1</p> <p>terrific [1] 2060/17</p> <p>terrified [4] 1939/11 1951/19 2044/15 2113/23</p> <p>terrifying [1] 1985/19</p> <p>terrorized [1] 1937/25</p> <p>testified [22] 1947/2 1950/6 1999/19 2000/5 2007/20 2013/20 2021/11 2022/1 2033/14 2043/4 2043/10 2045/6 2045/10 2048/21 2049/18 2049/18 2068/18 2068/22 2074/20 2082/16 2097/25 2097/25</p> <p>testify [9] 1999/17 2050/24 2059/10 2066/18 2068/18 2070/1 2070/4 2094/1 2097/10</p> <p>testifying [1] 2031/19</p> <p>testimony [27] 1937/18 1939/25 1944/4 1944/15 1944/19 1947/9 1957/16 1966/22 1978/18 1985/23 1986/2 2005/19 2007/10 2016/23 2018/19 2021/24 2040/23 2042/9 2044/11 2045/2 2049/21 2052/8 2060/13 2072/1 2072/3 2099/2 2105/14</p> <p>text [16] 1957/25 1958/9 1958/11 1958/14 1976/21 1978/2 1984/3 1984/6 1994/5 1997/25 2001/19 2002/2 2015/6 2033/18 2074/23 2075/6</p> <p>texted [1] 1948/16</p> <p>texting [2] 1939/4 1948/9</p> <p>texts [5] 2000/17 2001/12 2010/10 2011/17 2013/18</p> <p>theme [1] 2018/18</p> <p>themselves [7] 1952/8 2019/3 2019/16 2105/2 2111/9 2120/4 2120/8</p> <p>theory [1] 2029/25</p> <p>thereafter [3] 2082/11 2083/6 2087/25</p> <p>therefore [3] 1964/1 2007/7 2089/18</p> <p>thinking [3] 2022/9 2022/12 2063/23</p> <p>thinks [4] 2000/15 2003/14 2059/3 2066/7</p> <p>thinner [2] 1963/14 1963/14</p> <p>third [8] 1951/13 1954/10 1954/22 1964/18 1965/14 2038/2 2090/7 2090/8</p> <p>thousand [2] 1980/9 1980/17</p> <p>thousands [2] 2103/20 2107/7</p> <p>threat [4] 1962/5 1962/6 1962/10 1962/11</p> <p>threaten [3] 1950/15 1961/11 1985/6</p> <p>threatened [7] 1938/5 1939/10 1950/6 1960/24 1967/25 1989/5 2055/13</p> <p>threatening [8] 1938/19 1950/22 1951/13 1960/17 1961/13 1962/23 1988/25 1989/4</p> <p>threats [5] 1938/15 1950/12 1952/20 1962/9 2057/7</p> <p>three [42] 1937/24 1942/23 1950/22 1951/9 1954/14 1954/17 1955/3 1962/14 1964/5 1964/6 1981/5 1981/8 1985/18 2004/21 2005/5 2005/12 2028/11 2037/8 2039/2 2050/6 2056/22 2057/3 2057/21 2060/10 2063/7 2069/1 2082/6 2082/22 2083/2</p>
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[13] 2083/5 2083/9 2084/15 2099/16 2105/4 2108/21 2108/25 2109/9 2109/19 2109/21 2110/2 2112/3 2119/25 threw [1] 1951/12 throughout [4] 2039/4 2083/7 2095/17 2112/13 throw [1] 2058/3 throwing [1] 2103/19 thrown [1] 2067/2 throws [1] 2057/25 thumb [1] 1935/18 Thursday [1] 2122/7 ties [1] 2027/22 TikTok [1] 1985/11 timeline [1] 1940/24 timing [1] 1981/11 title [1] 1975/25 TLO [2] 1975/21 1975/22 tmr [1] 2003/4 today [14] 1996/8 1999/21 2011/2 2011/3 2012/4 2019/9 2040/5 2046/23 2068/25 2069/18 2072/18 2074/8 2101/5 2107/12 together [5] 1944/22 1947/9 2082/25 2109/22 2110/15 tomorrow [7] 2003/4 2003/5 2026/16 2062/8 2066/2 2119/10 2119/14 ton [1] 2028/4 tonight [2] 2002/10 2002/13 Tony [1] 2043/14 top [4] 1941/11 1966/12 2018/15 2044/20 topic [1] 2119/5 total [5] 1980/22 1982/21 2018/24 2032/10 2032/10 touch [2] 2042/13 2115/3 tour [1] 2010/4 toward [3] 1943/12 1987/13 2087/8 towards [1] 2116/13 towers [2] 2052/5 2057/20 towns [1] 2014/7 traced [1] 2040/15 track [5] 1941/18 1974/11 2002/9 2017/8 2026/8 tracked [2] 2016/25 2017/11 tracking [1] 1994/21 tracks [1] 1959/1 traffic [1] 2087/17 trail [1] 2114/20 transaction [4] 2029/18 2037/5 2077/17 2077/19 transactions [4] 2031/1 2032/13 2032/13 2081/12 transcripts [1] 1939/24 transfer [10] 1979/18 1979/19 1979/20 1979/22 1979/23 1979/25 1981/6 1981/6 1982/7 2005/7 transferred [4] 1980/20 1980/22 1995/15 2005/1 transitioning [1] 2003/18 translations [1] 2095/8 translator [7] 1971/6 1971/8 1975/12 2000/25 2086/17 2103/12 2117/2 transmitted [1] 1978/11 transparent [1] 2017/12 Transperfect [1] 2078/4</p>	<p>transpiring [1] 2006/2 transportation [1] 2084/16 trauma [1] 1962/4 traumatized [2] 1963/8 1963/8 travel [17] 1941/12 1943/2 1943/15 1946/21 1948/24 1949/22 1955/13 1956/9 1959/2 1960/14 1961/18 1967/19 1971/17 1972/13 2038/3 2038/13 2038/17 traveled [12] 1942/15 1942/17 1945/8 1954/5 1955/21 1956/14 1956/22 1956/25 1957/6 2037/23 2037/24 2038/9 traveling [3] 1945/1 1979/23 2101/20 travels [1] 2100/3 treated [1] 1982/10 treaty [1] 2045/24 triad [1] 2055/16 trial [16] 1933/9 1936/2 1937/4 1939/13 1953/12 1987/17 1996/18 2016/9 2027/12 2031/13 2040/22 2066/17 2071/15 2074/5 2076/8 2109/12 trick [1] 2069/10 trip [5] 1938/15 1945/21 1947/10 1947/13 1959/16 trips [1] 2100/22 trouble [3] 1944/6 2029/13 2029/14 true [14] 1968/15 1988/17 1991/21 1997/21 2033/25 2042/8 2043/1 2089/19 2114/19 2117/13 2117/23 2117/24 2120/12 2120/13 truly [1] 2037/1 trust [2] 2008/9 2008/15 trusted [3] 2008/10 2009/14 2016/12 truth [4] 2049/15 2055/11 2065/2 2096/11 Tu [29] 1945/6 1945/6 1946/4 1946/6 1946/14 1946/25 1947/2 1947/16 1955/15 1955/19 1966/13 1967/13 1983/16 1983/17 1983/25 1984/12 1996/15 1999/24 2005/21 2006/4 2006/12 2006/16 2006/19 2007/6 2008/18 2009/16 2045/4 2100/8 2105/1 Tu Lan [13] 1945/6 1945/6 1946/4 1946/6 1946/14 1946/25 1947/2 1947/16 1996/15 1999/24 2045/4 2100/8 2105/1 Tuesday [1] 2001/25 tumblesaults [1] 2064/16 TUNG [20] 1933/21 1934/24 1935/5 1991/7 2067/23 2068/11 2075/14 2076/6 2076/11 2078/13 2078/16 2080/10 2091/12 2093/3 2093/6 2104/1 2106/19 2107/13 2116/12 2123/7 Tung's [2] 2022/2 2091/23 turn [12] 1934/13 1974/13 1987/3 1992/10 1992/13 2019/23 2037/3 2067/20 2108/19 2111/9 2111/10 2111/11 turned [3] 1963/21 1991/20 2045/3 turns [5] 2000/9 2027/18 2030/19 2058/21 2091/5 Twenty [2] 2060/8 2060/8 twice [1] 1996/4 twisted [1] 2010/17 twisting [1] 2115/20</p>	<p>two [67] 1934/5 1936/19 1940/7 1940/15 1944/7 1949/10 1950/14 1951/6 1951/11 1951/15 1953/4 1953/24 1957/17 1961/24 1962/8 1964/9 1964/13 1965/21 1968/8 1968/11 1979/17 1981/3 1981/4 1984/19 1987/8 1987/16 1996/12 2011/5 2013/4 2013/20 2015/1 2018/5 2030/11 2032/25 2036/20 2037/16 2042/2 2049/23 2050/16 2051/15 2051/22 2053/19 2055/3 2055/4 2055/25 2056/6 2056/11 2056/15 2057/20 2057/21 2057/23 2059/3 2059/20 2063/7 2063/9 2064/17 2065/23 2067/9 2068/6 2082/24 2101/9 2109/25 2110/21 2112/23 2112/23 2116/16 2118/13 two weeks [3] 1940/7 1940/15 1949/10 two-handed [1] 1936/19 two-year [1] 2032/25 type [2] 2015/13 2015/14 types [1] 2118/24 typo [5] 1958/22 1958/24 1958/25 1971/9 2111/6</p> <p>U</p> <p>U.S [17] 1943/19 1947/3 1947/17 1956/16 1959/23 1967/17 1978/22 1982/24 1985/9 2017/2 2021/2 2045/24 2050/19 2098/4 2100/2 2101/3 2106/8 umbrella [2] 2012/5 2012/8 un-redacted [2] 1948/11 2080/20 unambiguously [1] 2110/7 unanimously [1] 1990/24 unbelievable [1] 2006/1 uncertain [2] 2000/19 2001/13 unclear [2] 2040/10 2040/10 understandable [1] 2055/22 understandably [1] 2020/24 understood [12] 1958/14 1975/18 1983/11 1997/10 2005/9 2005/10 2006/9 2026/1 2026/25 2045/4 2111/1 2115/17 undertake [1] 2002/8 undisputed [4] 1940/8 1991/20 1996/19 1997/3 unfair [1] 2033/2 unfortunately [1] 2023/9 unguarded [1] 2008/8 unidentified [1] 2121/6 unifying [1] 2112/13 unimaginable [1] 1993/13 unit [1] 1972/25 UNITED [43] 1933/1 1933/3 1933/3 1933/10 1933/13 1933/17 1938/1 1942/18 1943/20 1945/12 1945/20 1946/19 1946/21 1947/19 1948/6 1955/22 1956/14 1964/20 1967/16 1968/18 1970/4 1972/21 1974/4 1984/3 1987/22 1995/17 2048/6 2048/8 2068/5 2071/10 2071/21 2071/23 2073/10 2075/3 2083/21 2083/21 2089/11 2089/12 2089/20 2100/20 2105/17 2105/19 2105/23 United States [13] 1972/21 1984/3 2068/5 2071/10 2071/21 2071/23 2073/10 2075/3 2083/21 2083/21</p>
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<div>U</div> <div>United States... [3] 2089/11 2089/12 2089/20</div> <div>University [2] 2042/22 2042/25</div> <div>unjustly [2] 2044/18 2045/21</div> <div>unknowing [1] 2107/1</div> <div>unknowingly [3] 2069/3 2107/1 2107/4</div> <div>unlawful [3] 2015/20 2015/23 2112/15</div> <div>unlawfully [1] 2016/7</div> <div>unless [4] 1935/3 1935/22 1958/24 2067/21</div> <div>unlock [1] 1936/4</div> <div>unquestionably [1] 1970/6</div> <div>unquote [1] 2008/24</div> <div>unredacted [1] 2078/10</div> <div>unregistered [1] 2030/25</div> <div>unsafe [2] 1950/8 1962/3</div> <div>unsolicited [1] 1952/6</div> <div>unsupported [1] 2039/20</div> <div>unsure [1] 2114/5</div> <div>unwanted [1] 1952/6</div> <div>unwarranted [1] 2033/2</div> <div>unwilling [1] 1960/19</div> <div>update [2] 1942/10 1978/5</div> <div>updates [1] 1969/15</div> <div>upholding [1] 2109/4</div> <div>upper [1] 2082/14</div> <div>upsetting [1] 1952/16</div> <div>upside [3] 1963/21 2037/3 2108/19</div> <div>urge [2] 1937/5 2086/23</div> <div>user [3] 2034/23 2034/25 2036/17</div> <div>users [1] 2035/6</div> <div>uses [2] 2016/1 2027/5</div> <div>utilize [1] 2069/12</div>	<div>video [18] 1935/25 1938/25 1952/14 1952/15 1958/5 1961/8 1961/9 1996/3 2044/9 2045/22 2046/7 2057/7 2057/22 2058/12 2084/17 2086/25 2086/25 2087/1</div> <div>videos [4] 1935/16 1963/2 2039/14 2073/25</div> <div>videotape [6] 2009/12 2010/6 2010/16 2010/18 2025/4 2057/5</div> <div>view [7] 1966/5 1966/7 2025/23 2036/22 2052/23 2052/24 2067/10</div> <div>Vincent [13] 1950/17 1951/5 1960/12 1960/15 1961/2 1985/10 1986/2 1987/5 2048/25 2052/18 2068/22 2114/4 2114/18</div> <div>Vincent Kuang [4] 1950/17 1951/5 1987/5 2048/25</div> <div>Vincent Kuang's [1] 2052/18</div> <div>violated [4] 1977/11 2034/9 2034/23 2034/25</div> <div>violating [2] 2036/16 2075/25</div> <div>violation [2] 2037/5 2050/19</div> <div>virtue [1] 2034/8</div> <div>visit [2] 1960/1 1962/20</div> <div>voice [3] 2082/14 2083/13 2083/13</div> <div>volume [1] 2116/25</div> <div>volumes [1] 2037/12</div>	<div>week [4] 2003/7 2005/20 2044/10 2045/22</div> <div>weeks [8] 1940/7 1940/15 1943/10 1949/10 1971/14 1980/20 2065/23 2109/25</div> <div>weight [1] 2033/8</div> <div>Welcome [1] 2024/5</div> <div>wet [1] 2012/5</div> <div>whack [1] 2060/3</div> <div>WhatsApp [1] 2017/2</div> <div>whatsoever [10] 1996/14 2043/13 2047/22 2053/11 2054/5 2054/7 2059/23 2079/8 2083/23 2105/25</div> <div>Wheeler [4] 1999/3 1999/4 2017/6 2052/4</div> <div>wheels [1] 1956/2</div> <div>whereabouts [2] 2042/18 2073/25</div> <div>whip [1] 2064/22</div> <div>whole [14] 1997/1 2000/9 2000/13 2006/25 2008/7 2010/1 2019/3 2027/7 2038/10 2039/18 2040/4 2056/17 2114/21 2118/2</div> <div>wide [1] 1934/25</div> <div>wife [19] 1937/25 1938/16 1938/20 1947/11 1949/8 1951/3 1952/11 1968/2 1980/1 1980/23 1981/1 1981/9 1981/17 1986/14 1989/6 1995/4 2027/15 2028/16 2028/24</div> <div>willing [5] 1951/1 1986/13 2004/15 2045/19 2064/15</div> <div>window [1] 1961/25</div> <div>windows [1] 2012/3</div> <div>wins [1] 2000/12</div> <div>wire [11] 1979/18 1979/19 1979/20 1979/21 1979/23 1979/25 1981/6 1981/6 1982/7 2004/21 2005/7</div> <div>wired [1] 2028/14</div> <div>wiring [1] 2005/12</div> <div>wish [2] 2045/20 2067/17</div> <div>wishes [1] 2045/17</div> <div>withdraw [4] 2058/25 2059/7 2113/15 2114/14</div> <div>withdrawal [5] 2112/25 2113/3 2113/4 2113/25 2114/9</div> <div>withdrawn [1] 2113/17</div> <div>withdraws [1] 2113/19</div> <div>withdrew [2] 2061/6 2114/24</div> <div>witness [24] 1939/25 1994/5 1994/5 1998/2 1998/4 1998/4 1999/8 2009/10 2011/16 2017/19 2033/14 2033/19 2053/16 2053/24 2054/7 2054/12 2068/17 2068/21 2070/12 2095/23 2097/15 2097/25 2097/25 2123/3</div> <div>witness' [1] 1937/18</div> <div>witnesses [3] 1935/3 2054/1 2054/2</div> <div>woman [1] 1993/9</div> <div>won [2] 2068/5 2068/24</div> <div>wonder [3] 2045/5 2045/10 2063/21</div> <div>WONG [1] 1933/20</div> <div>word [7] 1984/6 1999/20 2000/2 2027/5 2027/7 2065/25 2066/1</div> <div>words [18] 1947/1 1948/23 1963/10 1968/8 1972/17 1983/2 1984/12 1984/18 1986/10 2012/15 2022/4 2052/10 2084/2 2104/10 2110/6 2110/24 2110/25 2111/1</div> <div>works [2] 2027/18 2055/22</div> <div>world [5] 1938/13 1948/24 2017/12</div>
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<p>W</p> <p>world... [2] 2034/21 2048/11 worried [4] 1950/9 1959/13 1959/22 1960/8 worries [1] 2023/16 worry [2] 1936/23 2096/15 worse [2] 2047/13 2060/16 worst [1] 2032/21 worth [1] 2021/24 wow [2] 2093/24 2094/5 wrap [5] 2017/10 2065/20 2066/20 2104/5 2104/10 Wray [1] 2022/8 wrestle [1] 2063/13 write [7] 1936/14 1940/4 2057/3 2057/14 2057/15 2059/2 2065/4 writes [1] 2056/22 written [5] 1992/24 2015/22 2015/23 2111/14 2115/16 wrongdoing [2] 1950/3 1950/4 wrote [11] 2016/5 2049/22 2050/6 2050/7 2050/13 2050/25 2051/2 2053/19 2056/1 2065/5 2065/7 Wuhan [2] 1947/16 1970/5</p>	<p>Yan's [3] 1944/4 1957/2 2117/11 Yang [1] 2026/20 year [6] 1959/18 2032/25 2036/2 2045/14 2051/15 2117/17 years [26] 1937/24 1938/20 1946/20 1951/3 1952/19 1968/2 1986/13 1987/4 1989/7 1993/11 2025/20 2025/20 2046/16 2048/5 2049/1 2050/16 2051/15 2051/22 2053/19 2055/25 2056/11 2056/15 2060/24 2064/17 2105/7 2116/16 yelled [1] 2007/15 yelling [1] 2057/6 yellow [1] 2100/4 yesterday [8] 1937/2 2008/14 2015/7 2059/16 2072/18 2073/19 2093/25 2122/1 Yong [183] 1939/9 1940/20 1940/24 1941/2 1941/3 1941/4 1941/6 1941/17 1942/4 1942/8 1942/13 1942/17 1942/25 1943/2 1946/12 1949/17 1949/22 1955/8 1955/10 1955/21 1956/2 1956/4 1956/11 1956/14 1956/22 1962/18 1966/24 1967/9 1967/14 1967/18 1969/3 1969/4 1969/8 1969/9 1969/10 1969/12 1969/12 1969/13 1969/14 1969/15 1969/19 1969/23 1969/25 1970/3 1970/11 1971/2 1971/5 1971/5 1971/6 1971/7 1971/11 1971/14 1971/21 1972/3 1972/6 1972/9 1972/14 1972/23 1973/12 1973/14 1973/18 1974/6 1974/12 1975/14 1979/12 1979/13 1987/21 1988/1 1988/3 1988/5 1988/7 1988/9 1992/6 1993/5 2069/8 2069/25 2070/3 2070/7 2070/21 2070/24 2071/8 2071/17 2071/20 2071/24 2072/3 2072/3 2072/24 2073/3 2073/7 2073/14 2074/25 2075/8 2075/19 2076/17 2076/18 2077/6 2077/13 2077/18 2077/25 2079/6 2079/9 2080/4 2080/17 2080/24 2081/1 2081/3 2081/4 2081/6 2081/6 2081/10 2081/17 2082/10 2082/18 2082/20 2082/21 2082/23 2083/2 2083/4 2083/9 2083/10 2083/15 2083/18 2083/18 2083/22 2084/2 2084/2 2084/18 2085/3 2086/17 2086/20 2087/19 2087/23 2088/4 2088/6 2088/12 2088/14 2088/24 2089/2 2089/12 2089/15 2089/18 2090/14 2090/22 2091/9 2095/7 2095/10 2095/16 2095/20 2095/21 2095/25 2096/2 2096/4 2096/5 2096/7 2096/20 2096/25 2098/10 2098/12 2100/4 2100/5 2100/18 2100/18 2100/23 2101/8 2101/11 2101/18 2101/21 2102/11 2102/15 2102/22 2103/2 2103/3 2103/9 2103/13 2103/14 2106/6 2106/24 2107/10 2116/21 2117/1 2117/4 2117/22 2118/12 Yong Zhu [50] 1992/6 1993/5 2080/4 2080/17 2080/24 2081/3 2082/10 2082/20 2082/21 2082/23 2083/2 2083/4 2083/9 2083/10 2083/15 2083/18 2083/18 2083/22 2084/2 2084/18 2087/19 2087/23 2088/4</p>	<p>2088/6 2088/24 2089/2 2089/12 2089/15 2089/18 2090/14 2095/20 2095/25 2096/2 2096/4 2096/5 2096/20 2098/12 2100/18 2100/18 2100/23 2101/8 2101/11 2101/18 2102/22 2103/2 2103/3 2103/9 2103/13 2103/14 2107/10 Yong Zhu's [6] 2081/10 2082/18 2084/2 2086/20 2088/12 2088/14 Yong's [5] 1970/8 1970/10 1970/15 2116/9 2118/6 YORK [11] 1933/1 1933/4 1933/14 1933/15 1968/20 2021/3 2033/13 2033/13 2046/4 2048/9 2062/21 young [2] 1972/18 2061/4 younger [2] 1947/18 1960/6 Your Honor [22] 2024/8 2032/3 2041/6 2065/10 2065/21 2066/12 2068/8 2069/18 2075/12 2076/4 2076/9 2078/9 2078/20 2079/13 2080/20 2084/23 2085/1 2086/2 2090/3 2108/9 2119/4 2122/2 yourself [10] 1938/11 1997/21 1998/16 2014/22 2028/18 2030/1 2034/4 2059/15 2065/19 2111/11 yourselves [4] 2054/12 2055/25 2062/3 2111/10 Yu [1] 2026/22 Yu Fang [1] 2026/22 Yup [1] 2121/10</p> <p>Z</p> <p>Zebin [2] 2042/9 2068/22 zero [5] 2055/21 2059/22 2059/24 2067/5 2067/7 Zheng [58] 1933/19 1939/9 1950/16 1950/19 1951/5 1951/17 1960/12 1960/15 1960/18 1960/25 1961/4 1961/6 1961/10 1961/19 1961/24 1962/13 1962/23 1966/25 1967/24 1984/20 1984/23 1985/1 1985/5 1985/6 1985/11 1985/14 1985/21 1985/23 1985/25 1986/11 1987/8 1988/23 1989/1 1989/4 1989/8 2069/6 2090/10 2099/2 2111/13 2111/22 2112/21 2112/22 2112/24 2113/8 2113/21 2114/14 2114/21 2114/23 2114/24 2115/1 2115/4 2115/13 2115/19 2115/22 2115/23 2115/24 2115/25 2116/4 Zheng's [1] 1960/10 Zhu [263] Zhu Feng [1] 2001/13 Zhu Jin's [1] 1984/3 Zhu Yong [18] 1939/9 1941/2 1941/3 1941/4 1941/6 1941/17 1942/4 1942/8 1942/13 1942/17 1949/17 1971/11 1987/21 1988/1 1988/3 1988/5 1988/7 1988/9 Zhu's [13] 1994/20 2005/3 2042/19 2071/20 2071/24 2081/4 2081/10 2082/18 2084/2 2086/17 2086/20 2088/12 2088/14 zoomed [1] 1976/18</p>
<p>X</p> <p>Xiao [2] 1966/13 1996/15 Xiao Jun [1] 1996/15 Xin [2] 2077/3 2077/7 Xinzi [4] 1950/1 2026/22 2038/2 2042/24 Xinzi Xu [1] 2042/24 Xu [194] Xu Jin [51] 1937/24 1938/2 1938/5 1938/9 1938/14 1938/17 1938/19 1938/23 1939/6 1940/22 1941/2 1941/22 1941/23 1942/1 1942/3 1943/5 1944/2 1945/3 1945/7 1945/14 1945/24 1945/25 1946/2 1946/24 1946/24 1947/15 1947/25 1948/1 1948/4 1948/4 1948/8 1948/14 1948/22 1948/25 1949/8 1949/15 1949/17 1949/25 1950/13 1951/14 1951/16 1987/3 1987/4 1987/14 1987/24 1988/19 1988/24 1992/4 1995/4 2026/22 2090/22 Xu Jin's [35] 1938/12 1938/14 1938/25 1942/3 1942/6 1944/15 1944/15 1945/1 1945/3 1945/19 1945/22 1946/18 1946/19 1946/23 1947/10 1947/14 1947/19 1947/20 1947/21 1948/3 1948/5 1948/9 1948/12 1949/7 1949/12 1949/13 1949/16 1949/18 1950/19 1951/12 1988/5 1988/13 1989/6 1993/20 2002/9 Xu Qin [1] 1947/15 Xu Xinzi [3] 1950/1 2026/22 2038/2 Xu's [4] 1944/19 1956/8 2001/2 2045/1</p> <p>Y</p> <p>Yahoo [1] 2073/10 Yan [27] 1943/8 1947/22 1952/5 1963/3 1963/9 1975/3 1995/12 1995/13 2003/19 2003/23 2004/6 2004/12 2004/19 2026/13 2041/3 2043/16 2045/6 2082/1 2083/20 2084/13 2087/20 2089/11 2089/16 2089/19 2098/16 2104/25 2105/1</p>		